OHIO VOLUNTARY ACTION PROGRAM (VAP)
ASTM E 1527-05 ALL APPROPRIATE INQUIRY

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Former Steel Ceilings Site
500 North Third Street
Coshocton, Coshocton County, Ohio

July 2010

Prepared For
Coshocton Port Authority 106 South Fourth Street Coshocton, Ohio 43812 Under Cooperative Agreement with U.S.EPA Cooperative Agreement #2B-00E88801-01

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TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY 1

2.0 INTRODUCTION 9

2.1 PURPOSE AND SCOPE 9
2.2 SPECIAL TERMS AND CONDITIONS 9
2.2.1 Authorization 9
2.2.2 VAP Eligibility 9
2.2.2.1 National Priority List Sites 9
2.2.2.2 Underground Injection Control Wells 9
2.2.2.3 RCRA Corrective Action Permit 10
2.2.2.4 Federal Enforcement 10
2.2.2.5 Solid Waste Closure 10
2.2.2.6 Hazardous Waste Closure 10
2.2.2.7 Petroleum Underground Storage Tank Systems 11
2.2.2.8 Oil and Gas Wells 12
2.2.2.9 Ohio EPA Enforcement Letter 12
2.2.3 Property Access 12
2.2.4 Use by Third Parties\Limitations 12
2.3 METHODOLOGY AND RESOURCES 13
2.3.1 Reconnaissance 13
2.3.2 Interviews 13
2.3.2.1 Current Interviews 13
2.3.3 Environmental Regulatory Database Information 14
2.3.4 Historical Use Information 15
2.3.5 Information Reported by User 15
2.3.6 Regulatory File Reviews 16
2.3.7 Previous Environmental Site Assessments 18
2.3.7.1 PRC Environmental Management, Inc., Preliminary Assessment/Visual Site Inspection (March 29, 1994) 18
2.3.8 Other Resources 22

3.0 SITE DESCRIPTION AND PHYSICAL SETTING 23

3.1 LOCATION AND LEGAL DESCRIPTION 23
3.1.1 Site Location 23
3.1.2 Legal Description 23
3.2 SITE AND VICINITY CHARACTERISTICS 24
3.3 DESCRIPTION OF SITE 24
3.4 PHYSICAL SETTING 24
3.4.1 Topographic Map Review 24
3.4.2 Floodplain Data 24
3.4.3 Coshocton County Soil Survey 25
3.4.4 Physical Geology 26
3.4.4.1 Bedrock Geology 26
3.4.4.2 Shallow Aquifer 26
3.4.5 Wetlands 27

4.0 PROPERTY USAGE 28

4.1 CURRENT USES OF THE PROPERTY 28
4.2 HISTORIC USES OF THE PROPERTY 28
4.2.1 Historical Topographic Map 29
4.2.2 Aerial Photographs 29
4.2.3 Sanborn Fire Insurance Maps 32
4.2.4 Historical Ownership of the Subject Property 34
4.3 PROPOSED USE OF THE PROPERTY 34
4.4 CURRENT AND PAST USES OF ADJOINING PROPERTIES 34

5.0 ENVIRONMENTAL REGULATORY RECORDS REVIEW 38

5.1 STANDARD FEDERAL AND STATE ENVIRONMENTAL RECORD SOURCES 38
5.2 DISCUSSION OF DATABASE FINDINGS 40
5.2.1 Federal ASTM Standard Records 40
5.2.1.1 National Priorities List (NPL) 40
5.2.1.2 Proposed NPL 40
5.2.1.3 National Priorities List Delisted (NPL Delisted) 40
5.2.1.4 Federal Superfund Liens (NPL Liens) 40
5.2.1.5 Comprehensive Environmental Response, Compensations, and Liability Information System (CERCLIS) 41
5.2.1.6 CERC No Further Remedial Action Planned (CERC-NFRAP) 41
5.2.1.7 CERCLA Lien Information (LIENS 2) 42
5.2.1.8 Corrective Action Report (CORRACTS) 42
5.2.1.9 Resource Conservation and Recovery Act Information (RCRAInfo) 43
5.2.1.10 United States Engineering Controls (US ENG CONTROLS) 46
5.2.1.11 United States Institutional Controls (US INST CONTROLS) 46
5.2.1.12 Emergency Response Notification System (ERNS) 47
5.2.1.13 Hazardous Materials Information Reporting System (HMIRS) 47
5.2.1.14 Incident and Accident Data (DOT OPS) 47
5.2.1.15 Clandestine Drug Labs (CDL) 47
5.2.1.16 United States Brownfield Sites (US BROWNFIELDS) 48
5.2.1.17 Department of Defense Sites (DOD) 48
5.2.1.18 Formerly Used Defense Sites (FUDS) 48
5.2.1.19 Land Use Control Information System (LUCIS) 48
5.2.1.20 Superfund Consent Decrees (CONSENT) 48
5.2.1.21 Records of Decision (ROD) 49
5.2.1.22 Uranium Mill Tailings Site (UMTRA) 49
5.2.1.23 Open Dump Inventory (ODI) 49
5.2.1.24 Mines Master Index File (MINES) 49
5.2.1.25 Toxic Chemical Release Inventory System (TRIS) 50
5.2.1.26 Toxic Substance Control Act (TSCA) 50
5.2.1.27 FIFRA/TSCA Tracking System (FTTS) 50
5.2.1.28 FIFRA/TSCA Tracking System Administrative Case Listings(HIST FTTS) 50
5.2.1.29 Section 7 Tracking Systems (SSTS) 51
5.2.1.30 Integrated Compliance Information System (ICIS) 51
5.2.1.31 PCB Activity Database System (PADS) 52
5.2.1.32 Material Licensing Tracking System (MLTS) 52
5.2.1.33 Radiation Information Database (RADINFO) 52

5.2.1.34 Facility Index System/Facility Registry System (FINDS) 53
5.2.1.35 RCRA Administrative Action Tracking System (RAATS) 54
5.2.1.36 State Coalition for Remediation of Drycleaners Listing (SCRD DRYCLEANERS) 54
5.2.2 State ASTM Standard Records 54
5.2.2.1 Solid and Hazardous Waste Sites (SHWS) Records 54
5.2.2.2 Division of Emergency & Remedial Response's (DERR) Database 55
5.2.2.3 Master Sites List (MSL) 55
5.2.2.4 DERR Town Gas Database (TOWNGAS) 55
5.2.2.5 Underground Injection Wells Listing (UIC) 56
5.2.2.6 Licensed Solid Waste Facilities (SWF/LF) 56
5.2.2.7 Old Solid Waste Landfill (HIST LF) 57
5.2.2.8 Leaking Underground Storage Tank Database (LUST) 57
5.2.2.9 Ohio Leaking UST Database (UNREG LTANKS) 58
5.2.2.10 Underground Storage Tank Database (UST) 58
5.2.2.11 Archived Underground Storage Tank Database (ARCHIVE UST) 59
5.2.2.12 Emergency Response Database (SPILLS) 59
5.2.2.13 Engineering Controls (ENG CONTROLS) 60
5.2.2.14 Institutional Controls (INST CONTROLS) 60
5.2.2.15 Voluntary Action Program Database (VCP) 60
5.2.2.16 Drycleaners (DRYCLEANERS) 60
5.2.2.17 Ohio Brownfield Inventory (BROWNFIELDS) 61
5.2.2.18 National Pollutant Discharge Elimination System (NPDES) 61
5.2.2.19 Title V Permits Database (AIRS) 61
5.2.3 EDR Proprietary Records 61
5.2.3.1 Manufactured Gas Plants 61
5.3 Other Environmental Records Sources 62
5.3.1 ODNR 62
5.3.2 City of Coshocton Health Department 63
5.3.3 City of Coshocton Fire Department 63
5.3.4 City of Coshocton, City Hall 63
5.3.5 Coshocton County Local Emergency Planning Committee 63

6.0 RECONNAISSANCE FINDINGS AND ENVIRONMENTAL HISTORY REVIEW 64

6.1 Reconnaissance Findings and Environmental History 64
6.1.1 Hazardous Substances in Connection with Property Use 65
6.1.2 Petroleum Products in Connection with Property Use 65
6.1.3 AST, UST, Hazardous Substance or Petroleum Product Storage 65
6.1.4 Hazardous Substance and Petroleum Product Containers and Unidentified Containers In Connection With Property Use 66
6.1.5 Electrical or Mechanical Equipment 67
6.1.6 Stains or Corrosion on Interior of Facility 67
6.1.7 Drains, Sumps, and Trenches 68
6.1.8 Pits, Ponds, and Lagoons 68
6.1.9 Stressed Vegetation 68
6.1.10 Suspect Fill Material 68
6.1.11 Waste Water Discharges 69
6.1.12 Wells 69
6.1.13 Odors 69
6.1.14 Suspect Asbestos Containing Material 69

6.1.15 Other Uses or Conditions of Concern 70
6.2 ADJOINING PROPERTY RECONNAISSANCE FINDINGS 70
6.2.1 Hazardous Substances in Connection with Adjacent Property Use 71
6.2.2 Petroleum Products in Connection with Adjacent Property Use 72
6.2.3 AST, UST Hazardous Substance or Petroleum Product Storage 72
6.2.4 Hazardous Substance and Petroleum Product Containers and Unidentified Containers in connection with the property 72
6.2.5 Drains Sumps and Trenches 72
6.2.6 Waste Water Discharges 73
6.2.7 Wells 73
7.0 CONCLUSIONS AND RECOMENDATIONS 74
7.1 PHASE I ENVIRONMENTAL SITE ASSESSMENT 74
8.0 PROFESSIONAL SIGNATURES 82

Figures

Figure 1 Topographic Map
Figure 2 Site Location Map
Figure 3a Site Aerial
Figure 3b Site Map
Figure 3c Identified Areas/Recognized Environmental Conditions Map
Figure 4 Flood Map
Figure 5 Soil Survey Map
Figure 6 Groundwater Resource Map
Figure 7 Groundwater Well Location Map
Figure 8 National Wetland Inventory Map

Appendices

Appendix A Correspondence Logs
Appendix B Site Photographs
Appendix C Regulatory Database Search Report
Appendix D Real Estate Information
Appendix E Historical Topographic Map
Appendix F Aerial Photographs
Appendix G Sanborn Maps
Appendix H ODNR Well Logs
Appendix I BUSTR Records
Appendix J Credentials
Appendix K References

1.0 EXECUTIVE SUMMARY

BJAAM Environmental (BJAAM) has completed a Voluntary Action Program (VAP)/All Appropriate Inquiry (AAI) Phase I Environmental Site Assessment (ESA) for the Former Steel Ceilings Site (Subject Property) located at 500 North Third Street, Coshocton, Coshocton County, Ohio 43812. The ESA was performed in general accordance with Ohio's Voluntary Action Program (VAP), Ohio Administrative Code (OAC) 3745-300-06 and ASTM Standard E 1527-05, which incorporates the Brownfield Revitalization Act All Appropriate Inquiry (AAI). The assessment was completed to comply with the agreement between BJAAM and the Coshocton Port Authority under Cooperative Agreement #2B-00E88801-1 with the United States Environmental Protection Agency (USEPA).

The purpose of the ESA was to investigate the potential presence of any regulated or hazardous substances including petroleum within the limits of the Subject Property or whether any regulated or hazardous substances including petroleum, from either on-site sources or off-site sources, have potentially negatively impacted the Subject Property.

The Subject Property is approximately 15.8 acres in size, and is comprised of one parcel #0430000296300. According to the Coshocton County Auditor, the Subject Property is owned by 2900 Steel LLC, an Ohio Corporation. According to historical research, the Subject Property was occupied by the Spellacy and Raff Company (manufacturers of kitchen enamel ware) beginning in the early 1900's and the Beach Enamel Company in the 1920's and 1930's. The Steel Ceilings Company occupied the Subject Property from the early 1960's until 2004. There is currently one (1) building at the Subject Property containing twelve (12) building segments with a total area of 83,066 sq ft. Currently the site building is vacant and there are no active site operations.

Interviews and reviews of historical records, aerial photographs, local governmental records and regulatory databases were conducted in accordance with VAP requirements and ASTM Standard E 1527-05 in an effort to identify evidence of Identified Areas (IA) and Recognized Environmental Conditions (REC) that may have impacted the Subject Property. Based on the results of these findings, it has been determined that the following thirteen (13) IAs/RECs need to be further assessed:

1. Hazardous Waste Drum Storage Area (DSA) (Solid Waste Management Unit (SWMU) 1), Raw Material and Empty DSA (AOC 2), and Former Gas Holding Tank/Gasometer
2. Building 10 - Paint Booth Satellite Accumulation Area (SAA) (SWMU 2), Xylene Still and SAA (SWMU 3), Former Tricholoroethene (TCE) Still and SAA (SWMU 4), and Underground Holding Tank (SWMU 8)
3. Scrap Metal Storage Area (SWMU 5)
4. DSA 1 (SWMU 6)
5. DSA 2 (SWMU 7) and Suspected Buried Drums and Septic Tank Area
6. TCE Tank (Area of Concern (AOC) 1) and Area East of Building 15/Eastern Loading Dock
7. Fuel Oil Underground Storage Tanks (USTs) (AOC 3)
8. Waste Water Discharge Outfalls (AOC 4)
9. Former Transformer Substation
10. Metal Fabricating Area/Furnace Room (Building 7)
11. Interior DSA (Building 8)
12. Beach Enamel Company/Spellacy and Raff Company Manufacturing Area and Interior DSA (Building 2)
13. Suspected Buried Kiln (Building 4)

1. Hazardous Waste Drum Storage Area (SWMU 1), Raw Material and Empty DSA (AOC 2), Former Gas Holding Tank/Gasometer: SWMU 1, the Hazardous Waste DSA was located at the western exterior wall of Building 2 and was active beginning in 1930. The area consisted of hazardous waste stored in drums, outside, on a sand and gravel parking surface for less the 90 days. The unit had no primary or secondary containment. The potential exists for a past release to have occurred in this area. The unit should undergo proper RCRA closure including soil and groundwater sampling. AOC 2, the Raw Material and Empty DSA, located along the western property boundary, along the fence line bordering the Columbia Gas

Service Center, north of the gated site entrance was active from at least 1956 until at least 1994. The area consisted of outside storage of drums of solvents used in painting operations. The drums were stored on a gravel surface. No secondary containment system or berm surrounded the area. The potential exists for a release to have occurred from this area to environmental media. A former gas holding tank was identified to the west of Building 2 in Sanborn Fire Insurance Maps dated 1905 thru 1931. Furthermore, a research of historical city directories indicates the Subject Property was also occupied by the Union 76 Co. bulk plant from the late 1960's thru at least the mid 1970's. Chemicals of Concern (COCs) include Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), Priority Pollutant Metals (PP Metals), Total Petroleum Hydrocarbons – Gasoline Range Organics (TPH-GRO), and Total Petroleum Hydrocarbons – Diesel Range Organics (TPH-DRO).

2. Building 10 - Paint Booth SAA (SWMU 2), Xylene Still and SAA (SWMU 3), Former TCE Still and SAA (SWMU 4), and Underground Holding Tank (SWMU 8): SWMU 2, the Paint Booth Satellite SAA, located on a concrete area within Building 10, managed hazardous and nonhazardous waste. No cracks or active drains were found near the unit. Small paint spills were found near the drums during a 1994 Preliminary Assessment/Visual Site Inspection conducted by PRC Environmental Management, Inc. (PRC) under contract with the U.S. EPA. PRC recommended no further action for the SWMU 2 in 1994. SWMU 3, the Xylene Still and SSA were located at the westerly end of the interior Building 10. The unit managed xylene-contaminated paint sludge and plastic bags used in the xylene distillation process. No floor drains were identified nearby. PRC recommended no further action for SWMU 3. SWMU 4, the Former TCE Still and SSA was located at the northerly wall of Building 10, east of center and was identified as a large pit approximately 15ft x 30ft x 7ft in size. The unit was no longer active during the 1994 visual inspection. In December 1993, Steel Ceilings converted the TCE vapor degreaser to a mildly alkaline aqueous degreaser, totally eliminating the use of TCE at the facility. There is a history of release to the City of Coshocton sanitary sewers from this unit.

According to PRC, the potential for a release to have occurred in this area was low. PRC recommended no further action for SWMU 4. SWMU 4 is located next to a drain connected to SWMU 8. Ohio EPA suspected that wastes from SWMU 4 or SWMU 8 could have been released to groundwater and on-site soils. SWMU 8, the Underground Holding Tank, located approximately at the front of the property, south of Building 10 was active from about 1954 until 1990. The facility used the 8,000 gallon underground holding tank to collect discharge from solvent and paint sludge containing waste water. In 1990, the Ohio EPA recommended that the waste water be rerouted and the tank eliminated from the waste stream because of the potential for soil and groundwater contamination from the tank or piping. Steel Ceilings eliminated the tank from the waste stream in July of 1990. COCs for the areas identified within Building 10 include VOCs and PP Metals.

3. Scrap Metal Storage Area (SWMU 5) – SWMU 5, the Scrap Metal Storage Area located to the north of Building 7 and west of Building 2 was active beginning in approximately 1930. Nonhazardous steel and aluminum metal scrap were managed in drums and a roll off box on a concrete pad. No releases from the unit were documented. PRC recommended no further action for SWMU 5. COCs include PP Metals and PCBs.
4. Inactive DSA 1 (SWMU 6) - SWMU 6, DSA 1, located at the northern exterior wall of Building 2 was active from about 1930 until 1983. The unit stored hazardous waste outdoors, in drums on sand and gravel for greater than 90 days. The unit was closed in 1983 and approximately 20 cubic yards of TCE contaminated soil and 100 drums were removed. There were no sampling details of the unit's closure documented and according to PRC, the EPA stated it was just beginning to develop closure policy at that time. COCs include VOCs, PAHs, and PP Metals.
5. Inactive DSA 2 (SWMU 7) and Suspected Buried Drums and Septic Tank Area - SWMU 7, DSA 2, located to the northeast of Building 6 was active from about 1930 until 1983. The unit stored hazardous waste outdoors, in drums on sand and gravel for greater than 90 days. The unit was closed in 1983 and approximately 20 cubic yards of TCE contaminated soil were removed. There were no sampling details of

the unit's closure documented and according to PRC; the EPA stated it was just beginning to develop closure policy at that time. The potential exists for a release to have occurred from this unit to environmental media. The unit should undergo soil sampling. In addition, vegetation in the area north of the northern loading dock (Building 6) appeared to be stressed. According to an interview with Mr. David Lear, former Maintenance Person with Steel Ceilings, this area to the north of Building 6, beyond the loading dock area may contain buried drums containing paint sludge, spent trichloroethylene and spent ethylene chloride. Other waste including enamel signs may also be buried in that area. According to Mr. Lear, a septic tank is located underground to the east of Building 6. COCs include VOCs, Polycyclic Aromatic Hydrocarbons (PAHs), PP Metals and PCBs.

6. TCE Tank (AOC 1) and Area East of Building 15/Eastern Loading Dock- AOC 1, the TCE aboveground storage tank (AST) located between Buildings 1 and 15 on a concrete pad was active from 1946 until 1994 and held 1,500 gallons of TCE. Access to the tank was on the east side. The concrete pad was unbermed and the area to the east of the AST was gravel covered. The eastern loading dock is located at the eastern wall of Building 15, just south of the TCE AST. This loading dock may have been used for the delivery of hazardous materials as Building 15 adjoins Building 10 where solvents and paint were utilized in the operations of Steel Ceilings. COCs include VOCs and PP Metals.
7. Fuel Oil USTs (AOC 3) - AOC 3, the Fuel Oil USTs located approximately 15 feet east of Building 1 were active from approximately 1931 until 1962. The area consisted of three (3) abandoned fuel oil USTs with a total capacity of 20,000 gallons. The tanks were first identified on a 1931 Sanborn Fire Insurance Map. The age and composition of the tanks are unknown. It was unknown whether the tanks had any release control systems. COCs include VOCs, PAHs, TPH-GRO, and TPH-DRO.
8. Waste Water Discharge Outfalls (AOC 4) - AOC 4, the Tuscarawas River Waste Water Discharge Outfalls consisted of two (2) waste water outfalls located extending out of the embankment north of the Subject Property site building. The

outfalls were connected to floor drains throughout the facility until 1990. The outfalls were not identified during site reconnaissance, however, according to a previous environmental report; in 1994 one of the outfalls was still active discharging cooling water from an air compressor. The other outfall appeared to be covered with brush and rubble from fill that had been placed along the bank. Aerial photos indicated a white colored waste water discharge from these areas. Wastewater from floor drains and a vapor degreaser may have discharged to soil and sediments of an unnamed creek which leads to the Tuscarawas River approximately 400 feet to the west of the Subject Property. The outfalls were used from 1906 until wastewater lines were rerouted in 1990. COCs include VOCs, PAHs, PP Metals, and PCBs.

9. Former Transformer Substation - A former transformer substation was identified to the east of Building 7 and north of Building 1. The substation was identified as a fenced in area with a concrete pad. Large electrical wires protrude from Building 1 and would have connected to the electrical transformers. Based on interviews with Mr. Dave Lear, former Maintenance Person with Steel Ceilings, the transformers were originally installed in approximately 1948. One (1) transformer was replaced in the 1950s. The potential exists for a release to have occurred from this area to environmental media. COCs include VOCs, PAHs, TPH-DRO, TPH-ERO, and PCBs.
10. Metal Fabricating Area/Former Beach Enamel Furnace Room (Building 7) – The area within the interior of Building 7 was used for metal cutting, stamping and fabricating. Three (3) pits, approximately 10ft x 10ft x 6ft were identified and previously were the locations of metal fabricating machines. The floor surrounding the metal fabricating machines was constructed of wooden brick. The westerly most pit is full of water with an oily sheen at the surface. Building 7 was used by the Beach Enamel Company as a furnace room. COCs include VOCs, PAHs, PP Metals and PCBs.
11. Interior DSA (Building 8) – Several material containers were identified at the eastern portion of Building 8 during site reconnaissance including the following: one (1)

drum of heavy duty metal drawing or stamping fluid, one (1) drum of hydraulic fluid, one (1) drum of solvent degreaser, one (1) drum of lubricant, one (1) drum of used oil, six (6) unlabeled drums, and three (3) 5 gallon buckets, contents unknown. The drums were stored on wooden crates on a concrete surface. COCs include VOCs, PAHs, and PP Metals.

12. Beach Enamel Company/Spellacy and Raff Company Manufacturing Area and DSA (Building 2) – The Beach Enamel and Spellacy and Raff Companies manufactured enamel ware at the Subject Property from at least the early 1900's through the 1930's. The main factory area for these operations was located in the area of Building 2. In addition, several containers of material were identified within Building 2 during site reconnaissance including the following: One (1) drum of isopropyl alcohol, one (1) drum of mineral spirits, one (1) drum of metal working fluid, one (1) drum of lithion soap grease containing none lead additives, one (1) drum of recycled solvent, two (2) 1 gallon containers of denatured solvent alcohol, one (1) approximately 25 gallon container of natural degreaser/deodorizer and approximately two (2) pallets and several additional 1 gallon containers of paint. Several light bulbs were also observed in this area. COCs include VOCs, PAHs, and PP Metals.
13. Suspected Buried Kiln (Building 4) – In an interview on May 17, 2010 Mr. David Lear, Former Maintenance Person with Steel Ceilings stated that during his time with the company, a large underground brick kiln was discovered in Building 4 when a portion of the floor collapsed under the weight of a tow motor. Pipes were found extending west from the brick kiln in Building 4 toward and beneath Building 2. The kiln was likely used in the manufacturing of enameled products produced by the Beach Enamel Company and/or Spellacy Raff Company from the early 1900's through at least the 1930's. COCs include VOCs and PP Metals.

The following potential off site area of concern (AOC) has been identified in connection with the adjoining property and could be impacting the Subject Property.

1. The property adjoining to the east of the Subject Property, Smurfit-Stone Container Division is listed on the Toxic Chemical Release Inventory System database and discharges liquid waste including lead compounds, acetaldehyde, dioxin and dioxin like compounds, and methanol to an unnamed creek which traverses the Subject Property approximately 170 feet north of the Subject Property site building. The creek flows to the west toward the Tuscarawas River located approximately 400 feet from the Subject Property. The waste stream outflow is located along the eastern Subject Property boundary.

Historic operations at the Subject Property may have resulted in release of contaminants. For approximate locations of the IAs/RECs outlined above, see Figures 3a – Site Map and 3b – IA/REC Map. Quantities and timing of potential release(s) cannot be determined from the information gathered for this Phase I report. The potentially impacted media includes but may not be limited to soil, groundwater, sediments, and/or surface water. Potential Chemicals of Concern (COC) include VOCs, SVOCs, PAHs, TPH-GRO, TPH-DRO, TPH-ERO, PP Metals, PCBs, and asbestos. Measures taken to address any potential release(s) will be covered within the Phase II of this project.

BJAAM recommends a comprehensive Phase II Environmental Site Assessment in accordance with VAP requirements be performed to evaluate the adverse environmental impact on soil and groundwater resulting from the Identified Areas outlined above. The Phase II ESA will allow BJAAM to delineate COCs in connection with historic operations from the IAs/RECs and determine compliance with applicable ASTM and VAP requirements.

2.0 INTRODUCTION

2.1 Purpose and Scope

This Phase I ESA was performed to identify, to the extent feasible, IAs and RECs as suspected of having an adverse environmental impact upon the Subject Property. The assessment included a review of reasonably available records, interviews, and site reconnaissance to evaluate whether such conditions exist in connection with the Subject Property. This report includes documentation to support the analysis, opinions and conclusions as presented.

2.2 Special Terms and Conditions

2.2.1 Authorization

Authorization to perform this assessment was given by the current owner, 2900 Steel LLC. Access to the site was granted by Mr. Douglas E. Myers, General Partner 2900 Steel, LLC and the Coshocton Port Authority. In addition, an Eligibility Determination was drafted by BJAAM on behalf of the Coshocton Port Authority and accepted by the U.S. EPA in order for the site to be assessed using funds from Coshocton Port Authority's Community Wide Brownfields Grant for Hazardous Substances, cooperative agreement #2B-00E88801-1.

2.2.2 VAP Eligibility

VAP eligibility requirements are outlined in OAC 3745-300-02. The VAP NFA form, revised in March of 2009, requires specific information relative to the eligibility of the Subject Property to be included within the Phase I ESA. The following sections provide information to this eligibility issue.

2.2.2.1 National Priority List Sites

As reported in Section 5.2.1 the Subject Property is not listed on the NPL.

2.2.2.2 Underground Injection Control Wells

There were no "injection wells" found within the bounds of the Subject Property.

2.2.2.3 RCRA Corrective Action Permit

Included in documentation provided by the Region 5 LCD was a letter addressed to Steel Ceilings Inc. from U.S. EPA Region 5 dated April 5, 2007. The correspondence stated that the property will need to be addressed under the RCRA Corrective Action Program and a final remedy is expected to be in place at the facility by 2020. Please see Section 5.0 for more information.

2.2.2.4 Federal Enforcement

The Subject Property is not subject to a federal enforcement action, requiring site assessment, removal or remedial activities, pursuant to any federal laws or regulations. Please see Section 5.0 for more information.

2.2.2.5 Solid Waste Closure

The Subject Property is not a licensed or permitted "solid waste facility". Please see Section 5.0 for more information.

2.2.2.6 Hazardous Waste Closure

A Freedom of Information Act (FOIA) request to review files was completed with the Ohio EPA Southeast District Office (SEDO). According to files obtained from the Ohio EPA SEDO, the Subject Property was a RCRA Treatment, Storage and Disposal Facility (TSDF) until April of 1983 because of storage activities greater than the 90 day limit. The facility did not treat or dispose of hazardous waste on the Subject Property. Closure activities took place from December of 1982 through January of 1983 and included the removal of approximately 100 drums of hazardous waste and 26 cubic yards of trichloroethylene (TCE) contaminated soil from an onsite drum storage area west of the site building (AOC 2) to an off-site facility. Steel Ceilings sent certification to finalize the closure of the drum storage area was to the U.S. EPA on March 15, 1983. On April 19, 1983 a letter was sent to Steel Ceilings from the U.S. EPA stating closure was accomplished and the facility was compliant with 40 CFR 262.34; Steel Ceilings was considered a generator only.

After 1983, Steel Ceilings generated quantities of waste that could have classified them as either a Small Quantity Generator or a Large Quantity Generator (LQG). The company preferred to be listed as a LQG to eliminate the possibility of frequent re-notification of generator status. The facility remained a LQG of Hazardous Wastes, including paint waste and chlorinated solvents, until April 4, 1996, when the RCRA classification was changed to Conditionally Exempt Small Quantity Generator (CESQG). According to comments made during a RCRA inspection on March 26, 1996 Steel Ceilings discontinued the use of TCE in July 1994. TEC was replaced with a non-hazardous, water based solution at that time. The elimination of the TCE waste stream reclassified Steel Ceilings from a LQG to a CESQG. During the time of the March 26, 1996, inspection, the only hazardous waste being generated at the facility were waste naptha solvents from painting operations at a rate of approximately 55 gallons per year. Because the facility was a CESQG at the time of the facility closure, no hazardous waste closure should be required for VAP eligibility.

Steel Ceilings Inc. was notified by the U.S. EPA Region 5 in a letter dated April 5, 2007, that the property will need to be addressed under the RCRA Corrective Action Program. A final remedy is expected to be in place at the facility by 2020. The Subject Property or those portions of the Subject Property subject to RCRA corrective action requirements could be ineligible for the VAP.

2.2.2.7 Petroleum Underground Storage Tank Systems

The State Fire Marshall (SFM)/Bureau of Underground Storage Tank Regulations (BUSTR) has no records on file of petroleum UST Systems, as defined at OAC 1301:7-9-02(B)(35), located on the Subject Property. Subject Property is not currently subject to site assessment, removal, or remediation, pursuant to sections 3737.88, 3737.882, 3737.89 of the Revised Code and the Administrative Code rules adopted there under regarding underground storage tank systems.

According to a blue print of the facility dated 1969 found in the former maintenance area of the site building during site reconnaissance, three (3) fuel oil underground storage tanks (USTs) were located at the southeast portion of the Subject Property. According to an interview with Mr. David Lear, Maintenance Person at the facility from 1985 to 2004, the USTs were not removed. Therefore, this area will be designated as an IA/REC and sampled in accordance with OAC 3745-300-07. Although designated as an IA/REC, USTs containing fuel oil used for consumptive purposes on site are exempt from BUSTR rules and requirements and therefore, would not preclude eligibility in the VAP Program.

2.2.2.8 Oil and Gas Wells

According to Ohio Department of Natural Resources (ODNR) gas and oil well database, there are no known oil and gas wells located on the Subject Property.

2.2.2.9 Ohio EPA Enforcement Letter

The Subject Property is not subject to an enforcement letter as defined in OAC 3745-300-02-(B) relating to a release or threatened release of hazardous substances or petroleum.

2.2.3 Property Access

Access to the Subject Property was granted by Douglas E. Myers, General Partner with Mr. Douglas E. Myers, General Partner 2900 Steel, LLC and the Coshocton Port Authority.

2.2.4 Use by Third Parties\Limitations

This report was prepared pursuant to the agreement BJAAM has with the Coshocton Port Authority. The contractual relationship includes an exchange of information about the Subject Property that is unique between BJAAM and its client, and serves as the basis upon which this report is prepared. Because of the importance of the communication between BJAAM and its client, reliance or any use of this report by anyone other than the Volunteers, for whom it was prepared, is prohibited.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to BJAAM's agreement with the Coshocton Port Authority. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at the third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

2.3 Methodology and Resources

2.3.1 Reconnaissance

Initial site reconnaissance was performed on May 12, 2010, by Mr. Jay Dahl and Ms. Lauren Glockner Project Managers with BJAAM Environmental. Visual reconnaissance of the adjacent properties was limited to areas which could be observed from the Subject Property or adjacent public access areas. Please see Appendix B for Site Photograph Log.

2.3.2 Interviews

2.3.2.1 Current Interviews

Mr. Mark Frank, City of Coshocton Health Department, Environmental Health – Mr. Frank was contacted for information pertaining to environmental issues and complaints at the Subject Property. The request included the Subject Property located at 500 N. Third Street, Coshocton Ohio. Mr. Frank replied by email stating that computer records showed no information of complaints on the Steel Ceilings Site.

Captain Jeffery Corder of the Coshocton Fire Department – Captain Corder was contacted for information regarding USTs, chemical spills or other environmentally sensitive information. BJAAM received correspondence via email stating there is no record of any type of fires or spills on the property that would have caused issues dating back to January 1, 1999.

Ms. Cherry Wilson, Coshocton City Hall – Ms. Wilson was contact for information with regard to zoning and permitting at the Subject Property. Ms. Wilson replied by telephone stating the Subject Property is zoned M-1 (Light Manufacturing District).

Mr. James Van Horn, Coshocton County Local Emergency Planning Committee – The Local Emergency Planning Committee was contacted for information pertaining to chemical spills or storage, USTs, fires or other environmental issues at the Subject Property. Mr. Van Horn replied by letter stating that files had been found. According to chemical inventory forms included with the site file, trichloroethylene, xylene, and paint were used at the Subject Property.

Mr. David Lear, Former Maintenance Person, Steel Ceilings (1985-2004) – Mr. David Lear, former Maintenance Person at the Subject Property from 1985 until 2004, came to the Coshocton Port Authority on May 17, 2010 to offer site specific information in order to help with Phase I activities. A telephone interview was conducted with Mr. Lear on May 19, 2010 regarding site history and former site activities.

Correspondence logs and interview records are included in Appendix A.

2.3.3 Environmental Regulatory Database Information

Information, for the federal and state environmental record sources specified in the VAP and ASTM requirements, was obtained through Environmental Data Resources (EDR) and applicable regulatory agencies. This information was reviewed to help identify evidence of recognized environmental conditions in connection with the Subject Property. Sites listed in the database with insufficient address or geocoding information to be mapped (orphan sites) were evaluated for potential location within the approximate minimum search distance (AMSD), which was ½-mile. Copies of the EDR research data and a description of the databases are included in Appendix C. Correspondence and records relative to regulatory agency searches not provided for in the EDR report are included in applicable portions of this report.

2.3.4 Historical Use Information

A history of previous uses of the Subject Property, and prior uses of properties in the surrounding area, to the extent that this information was revealed in the course of researching the Subject Property itself, was developed consistent with practices specified in the VAP requirements. From the standard historical sources as specified in the VAP requirements, BJAAM reviewed those sources listed below which are also listed in Appendix K.

- United States EPA (Appendix A)
- Ohio EPA Southeast District Office (Appendix A)
- Ohio EPA Central Office (Appendix A)
- Bureau of Underground Storage Tank Regulations (Appendix A)
- City of Coshocton Fire Department (Appendix A)
- City of Coshocton Health Department (Appendix A)
- City of Coshocton City Hall (Appendix A)
- Environmental Data Resources, Inc. Regulatory Database Research (Appendix C)
- Historical topographic maps from Environmental Data Resources, Inc.: 15' Series Coshocton, Ohio quadrangle, 1915, and 7.5' Series Coshocton, Ohio quadrangle, 1961, 1978, 1985, 1992, 1994 (Appendix E)
- Aerial photographs dated: 1948, 1959, 1976, 1982, 1985, 1990, 1994, 2000, 2005, and 2006 from EDR (Appendix F) and 1946, 1951, 1956, 1963, 1970, 1974, 1982, 1990, 1994, and 2004 from the Ohio Department of Transportation, Office of Aerial Engineering (Appendix F)
- Sanborn Fire Insurance Maps: Environmental Data Resources, Inc. (Appendix G)
- Groundwater Well Logs: Ohio Department of Natural Resources (Appendix H)
- Bureau of Underground Storage Tank Regulations: (Appendix I)
- Topographic Map: 7.5' Series Coshocton Ohio Quadrangle from DeLORME TopoQuads (Figure 1)
- Site Location Map: DeLORME Street Atlas (Figure 2)
- Site Map: Based on the Coshocton County GIS System (Figure 3a-3b)
- Flood Map: National Flood Insurance Program (Figure 4)
- Soil Survey Map: National Resources Conservation Service (Figure 5)
- Groundwater Resources Map: Groundwater Resources Map of Coshocton County Ohio, Ohio Department of Natural Resources (1988)
- Groundwater Well Location Map: Environmental Data Resources, Inc. and Ohio Department of Natural Resources (Figure 7)
- National Wetland Inventory Map: U.S. Fish and Wildlife Service, National Wetlands Inventory (Figure 8)

2.3.5 Information Reported by User

Pursuant to VAP requirements, BJAAM requested that the site owner provide any environmental information or communicate any special knowledge or experience that is

material to recognized environmental conditions in connection with the Subject Property. The owner of the Subject Property was unable to be contacted for further information other than to gain site access.

2.3.6 Regulatory File Reviews

Freedom of Information Act (FOIA) requests were submitted to the United States Environmental Protection Agency (U.S. EPA), the Ohio Environmental Protection Agency (Ohio EPA) Central Office and the Ohio EPA Southeast District Office in order review files pertaining to the Subject Property. Summaries of those files are included below and are referred to in appropriate sections of this report. Correspondence logs can be found in Appendix A of this report.

U.S. EPA – An online FOIA request to review files pertaining to the Subject Property was submitted to the U.S. EPA for all divisions and all years on May 3, 2010. Ms. Anna Rzeznik responded by letter dated May 3, 2010, stating that the request has been received and program offices would respond directly before June 1, 2010. Ms. Suzanne Coll of the Superfund division responded by email on May 13, 2010, and attached documents including a Preliminary Assessment/Visual Inspection dated March 29, 1994 completed by PRC Environmental Management Inc. The Preliminary Assessment/Visual Inspection report is summarized in Section 2.3.6 of this report. The correspondence also included a Superfund Site Information sheet regarding the Subject Property that stated the status of the site is not on the National Priority List (NPL) and is deferred to RCRA. Ms. Jane Ratcliffe, Chief Internal Services Section of the U.S. EPA Region 5 Land and Chemicals Division (LCD) responded to the FOIA request on May 21, 2010, and provided documents including several correspondences and a copy of the Preliminary Assessment/Visual Inspection report provided by the Superfund Division. Included in documentation provided by the Region 5 LCD was a letter addressed to Steel Ceilings Inc. from U.S. EPA Region 5 dated April 5, 2007. The correspondence stated that the property will need to be addressed under the RCRA Corrective Action Program and a final remedy is expected to be in place at the facility by 2020.

Ohio EPA, Central Office – A FOIA request was submitted to Mr. Richard Bouder, Public Records Manager for the Ohio EPA Central Office on May 4, 2010. Mr. Bouder responded by letter on May 14, 2010, and enclosed copies of Ohio EPA Central Office files from the Division of Hazardous Waste. The file contained correspondences including notices of violations and inspection reports. All documents included in the Central Office Files were also included in Southeast District Office Files.

Ohio EPA, Southeast District Office – A FOIA request for all available records was submitted to Ms. Angie Hardesty via fax on May 3, 2010. Ikon Business Solutions was hired to scan and provide BJAAM with a .pdf of all available SEDO files. According to files obtained from the Ohio EPA SEDO, the Subject Property was a RCRA Treatment, Storage and Disposal Facility (TSDF) until April of 1983 because of storage activities greater than the 90 day limit. The facility did not treat or dispose of hazardous waste on the Subject Property. Closure activities took place from December of 1982 through January of 1983 and included the removal of approximately 100 drums of hazardous waste and 26 cubic yards of trichloroethylene (TCE) contaminated soil from an onsite drum storage area to an off-site facility. Steel Ceilings sent certification to finalize the closure of the drum storage area to the U.S. EPA on March 15, 1983. On April 19, 1983, a letter was sent to Steel Ceilings from the U.S. EPA stating closure was accomplished and the facility was compliant with 40 CFR 262.34; Steel Ceilings was considered a generator only. The facility remained a Large Quantity Generator (LQG) of Hazardous Wastes including paint waste and chlorinated solvents until April 4, 1996. During that time, Steel Ceilings generated quantities of waste that could have classified them as either a Small Quantity Generator or a LQG. The company preferred to be listed as a LQG to eliminate the possibility of frequent re-notification of generator status. According to comments made during a RCRA inspection on March 26, 1996, Steel Ceilings discontinued the use of TCE in July 1994. TCE was replaced with a non-hazardous, water based solution at that time. The elimination of the TCE waste stream reclassified Steel Ceilings from a LQG to a CESQG. During the time of the March 26,

1996, inspection the only hazardous waste being generated at the facility was waste naptha solvents from painting operations at a rate of approximately 55 gallons/year.

2.3.7 Previous Environmental Site Assessments

Copies of the previous reports were obtained, reviewed and are summarized below:

2.3.7.1 PRC Environmental Management, Inc., Preliminary Assessment/Visual Site Inspection (March 29, 1994)

PRC Environmental Management, Inc. (PRC), under contract with the U.S. EPA, performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Steel Ceilings facility. The report was provided by the U.S. EPA Region 5 Superfund Division in response to a Freedom of Information Act (FOAI) request for files. The report was also received in documents provided by the U.S. EPA Region 5 Land and Chemicals Division. The assessment and inspection revealed evidence of eight (8) SWMUs and four (4) AOCs.

PRC recommended further action at four (4) SWMUs including SWMU 1, SWMU 6, SWMU 7, and SWMU 8 and all four AOCs (AOCs 1 – 4).

SWMU 1, the (then) Active Hazardous Waste Drum Storage Area (DSA) was located at the western exterior wall of Building 2 and was active beginning in 1930. The area consisted of hazardous waste stored in drums, outside, on a sand and gravel parking surface for less the 90 days. The unit had no primary or secondary containment. According to PRC the potential for a past release to have occurred to soil was high, the potential for a release to groundwater, surface water, and air was moderate. Though no spills or staining or other evidence of release was observed PRC recommended that the unit should undergo property closure including soil sampling.

SWMU 2, the Paint Booth Satellite Accumulation Areas (SAA), located within Building 10 on a concrete area managed hazardous and nonhazardous waste. No cracks or

active drains were found near the unit. Small paint spills were found near the drums; however, they do not pose a threat to environmental media. The SWMU had no documented releases and the potential for release to groundwater, surface water, air, and on-site soils was low. PRC recommended no further action for the SWMU.

SWMU 3, the Xylene Still and SSA were located at the westerly end of the interior Building 10. The unit managed xylene-contaminated paint sludge and plastic bags used in the xylene distillation process. No floor drains were identified near by. PRC recommended no further action for SWMU 3.

SWMU 4, the Former TCE Still and SSA was located at the northerly wall of Building 10, east of center. The unit was no longer active during the 1994 visual inspection. In December 1993, Steel Ceilings converted the TCE vapor degreaser to a mildly alkaline aqueous degreaser totally eliminating the use of TCE at the facility. There is a history of release to the City of Coshocton sanitary sewers from this unit. SWMU 4 is located next to a drain connected to SWMU 8. Ohio EPA suspected that wastes from SWMU 4 or SWMU 8 could have been released to groundwater and on-site soils. According to PRC, the potential for release to groundwater and soils in 1994 was low and the potential for release to surface water and air was low. PRC recommended no further action for SWMU 4.

SWMU 5, the Scrap Metal Storage Area located to the north of Building 7 and west of Building 2 was active beginning in approximately 1930. Nonhazardous steel and aluminum metal scrap were managed in drums and a roll off box on a concrete pad. No releases from the unit were documented. The potential for a release to have occurred to groundwater, surface water, air or on-site soil was low. PRC recommended no further action for SWMU 5.

SWMU 6, the Inactive DSA 1, to the northern exterior wall of Building 2 was active from about 1930 until 1983. The unit stored hazardous waste outdoors, in drums on sand

and gravel for greater than 90 days. The unit was closed in 1983 and approximately 20 cubic yards of TCE contaminated soil and 100 drums were removed. There were no sampling details of the unit's closure document and according to PRC at this time the EPA stated it was just beginning to develop closure policy. According to PRC the potential for a release to have occurred from this unit to surface water and on-site soils was high, the potential for release to groundwater was moderate, and the potential for release to air was low. Though no stains or spills were observed, PRC recommended that the unit undergo soil sampling.

SWMU 7, the Inactive DSA 2, located to the north east of Building 6, up gradient side of the topographical drop off north of the site building was active from about 1930 until 1983. The unit stored hazardous waste outdoors, in drums on sand and gravel for greater than 90 days. The unit was closed in 1983 and approximately 20 cubic yards of TCE contaminated soil were removed. There were no sampling details of the unit's closure document and according to PRC at this time the EPA stated it was just beginning to develop closure policy. According to PRC the potential for a release to have occurred from this unit to on-site soils was high, the potential for release to groundwater and surface water was moderate, and the potential for release to air was low. Though no stains or spills were observed, PRC recommended that the unit undergo soil sampling.

SWMU 8, the Underground Holding Tank, located approximately at the front of the property, south of Building 10 was active from about 1954 until 1990. The facility used the approximately 8,000 gallon underground holding tank to collect discharge from solvent and paint sludge containing waste water. In 1990, the Ohio EPA recommended that the waste water be rerouted and the tank eliminated from the waste stream because of the potential for soil and groundwater contamination from the tank or piping. Steel Ceilings eliminated the tank from the waste stream in July of 1990. According to PRC the potential for a release to have occurred from this unit to groundwater and on-site soils was high; the potential for release to surface water and air was low. Though

there was no evidence of a release observed, PRC recommended the unit be removed and soil sampling conducted to determine if a release had occurred.

AOC 1, the TCE aboveground storage tank (AST) located between Buildings 1 and 15 on a concrete pad was active from 1946 until 1994 and held 1,500 gallons of TCE. Access to the tank was on the east side. The concrete pad was unbermed and the area to the east of the AST was gravel covered. According to PRC, the potential for a release to have occurred from this area to on-site soils was high, and the potential for release to groundwater and air was moderate, and the potential for release to surface water and air was low. Though there was no evidence of a release observed, PRC recommended soil sampling for the unpaved area around the tank.

AOC 2, the Raw Material and Empty DSA, located along the western property boundary, along the fence line bordering the Columbia Gas Service Center, north of the gated site entrance was active from at least 1956 until at least 1994. The area consisted of outside storage of drums of solvents used in painting operations. The drums were stored on a gravel surface. No secondary containment system or berm surrounded the area. According to PRC, the potential for a release to have occurred to on-site soil was high, and the potential for release to groundwater, surface water and air was low. Though there was no evidence of a release observed, PRC recommended soil sampling of the area.

AOC 3, the Fuel Oil USTs located approximately 15 feet east of Building 1 were active from approximately 1931 until 1962. The area consisted of three (3) abandoned fuel oil USTs with a total capacity of 20,000 gallons. The tanks were first identified on a 1931 Sanborn Fire Insurance Map. The age and composition of the tanks was unknown. It was unknown whether the tanks had any release control systems. According to PRC, the potential for a release to have occurred to groundwater and onsite soils was high. The potential for release to surface water and air was low.

AOC 4, the Tuscarawas River Waste Water Discharge Outfalls consisted of two (2) outfalls located extending out of the embankment north of the Subject Property site building. The outfalls were connected to floor drains throughout the facility until 1990. As of 1994, one of the outfalls was still active for cooling water from the air compressor. The other outfall appeared to be covered with brush and rubble from fill that had been placed along the bank. Aerial photos examined for the purposes of the assessment indicated a white colored waste water discharge from these areas. Wastewater from floor drains and a vapor degreaser may have discharged to soil and sediments along the discharged path to the Tuscarawas River. The outfalls were used from 1906 to 1990. Wastewater lines were rerouted in 1990. According to PRC, the potential for a release to have occurred to surface water and on-site soils was high, the potential for a release to groundwater was moderate and the potential for a past release to air was low. Though no evidence of a release was observed during visual inspection, PRC recommended sampling of soil and sediment in the area of the outfalls to determine if a release had occurred.

2.3.8 Other Resources

Other resources and information accessed for purposes of this site assessment are discussed in appropriate sections of the report. Credentials and certifications of the environmental professionals responsible for the preparation of this report are included in Appendix H.

3.0 SITE DESCRIPTION AND PHYSICAL SETTING

3.1 Location and Legal Description

3.1.1 Site Location

The Subject Property is known as the Former Steel Ceilings Site. The Subject Property is approximately 15.8 acres in size, and is comprised of one parcel #0430000296300. According to the Coshocton County Auditor, is owned by 2900 Steel LLC, an Ohio Corporation. The Subject Property has a long history of former occupants, including the Beach Enamel Company and the Steel Ceilings Company. There is currently one (1) building at the Subject Property containing twelve (12) building segments with a total area of 83,066 sq ft. Currently the site building is vacant and there are no active site operations. The approximate Latitude and Longitude Coordinates for the Subject Property are as follows:

- Northeast corner: 40°17'01.59" N and 81°51'54.47" W
- Northwest corner: 40°17'00.62" N and 81°51'58.26" W
- Southeast corner: 40°16'42.87" N and 81°51'55.08" W
- Southwest corner: 40°16'43.00" N and 81°52'00.31" W
- Center of Site Buildings: 40°16'44.33" N and 81°51'56.75" W

The Subject Property is bound to the north by the Tuscarawas River and to the south by a parking area owned by the Smurfit-Stone Container. The eastern adjoining property is occupied by Smurfit-Stone Container. The western adjoining property is occupied by the Columbia Gas Service Center. The Subject Property's location is displayed on the 7.5 minute USGS topographic map and a site location map of the area provided as Figures 1 and 2, respectively.

3.1.2 Legal Description

The legal description for the Subject Property is provided the within the property deed located within the EDR Environmental Lien Search Report in Appendix D. No

environmental liens were discovered. Furthermore, the Subject Property was not listed on the NPL or CERCLA Liens databases (Sections 5.2.1.4 and 5.2.1.7 respectively).

3.2 Site and Vicinity Characteristics

The Subject Property is located in a mixed industrial area of the City of Coshocton. Columbia Gas occupies the property to the west and Smurfit-Stone Container occupies the property to the east. The Subject Property is bound to the north by the Tuscarawas River. Beyond the southern adjoining property is a residential dwelling. There are numerous commercial/industrial facilities and residences intermingled within a ½-mile radius of the Subject Property.

3.3 Description of Site

The Subject Property is known as the Former Steel Ceilings Site. The Subject Property is approximately 15.8 acres in size, and is comprised of one parcel #0430000296300. According to the Coshocton County Auditor, is owned by 2900 Steel LLC, an Ohio Corporation. The Subject Property has a long history of former occupants, including the Beach Enamel Company and the Steel Ceilings Company. There is currently one (1) building at the Subject Property containing twelve (12) building segments with a total area of 83,066 sq ft. Currently the site building is vacant and there are no active site operations except those associated with this environmental assessment.

3.4 Physical Setting

3.4.1 Topographic Map Review

A current United States Geological Survey 7.5-minute quadrangle topographic map showing the area on which the Subject Property is located was obtained and reviewed as specified in VAP requirements. According to the 1996 USGS Coshocton Quadrangle Map, the Subject Property lies approximately 760 feet above mean sea level as shown in the Topographic Map included in Figure 1.

3.4.2 Floodplain Data

According to a Flood Insurance Rate Map (FIRM) obtained from the FEMA website, for the vicinity of the Subject Property, the majority of the Subject Property site building lies

in an area determined to be outside of the 0.2% annual chance flood plain. Just to the north of the site building lies Zone X, an area of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1% annual chance flood. The area approximately 120 feet to north of the Subject Property site building, over the approximate 10 foot embankment is located within Zone AE. Zone AE corresponds to areas with a 1% annual chance of flooding. A copy of the flood map is included as Figure 4.

3.4.3 Coshocton County Soil Survey

According to the National Resources Conservation Service (NRCS) Web Soil Survey of Coshocton County, Ohio of the U.S. Department of Agriculture the general soil types defined for the area occupied by the historical industrial activities the Subject Property majority are the Chili-Urban land complex, 0 to 2 percent slopes (CgA) at the most southern portion and Tioga-Urban land complex (To), rarely flooded at the northern portion and behind the site building. The soil type located down gradient of the Subject Property site building is considered Newark silt loam, occasionally flooded (Ne). The soil type at northeast and southeast corners of the Subject Property is Coshocton Silt Loam, 6 to 15 percent slopes, eroded (CoC2). A copy of the soil survey map is provided as Figure 5.

1. Chili-Urban land complex, 0 to 2 percent slopes (CgB): This soil type lies at approximately 700 to 1,160 feet amsl. The mean annual precipitation is from 32 inches to 45 inches. Slope is approximately 0 to 2 percent. This soil is well drained and the capacity of the most limiting layer to transmit water (Ksat) is moderately high to high (0.6 to 2.0 in/hr). Depth to the water table in these soils is greater than 80 inches. The maximum calcium carbonate content is 5 percent. The typical profile is loam down to 8 inches, gravelly clay loam from 8 inches to 30 inches, very gravelly loam from 30 to 48 inches, and stratified very gravelly sand to very gravelly loamy sand from 45 inches to 85 inches.

2. Tioga-Urban land complex (To): This soil type lies at approximately 600 to 1,800 feet amsl. The mean annual precipitation is from 30 to 50 inches. Slope is approximately 0 to 2 percent. The soil is well drained and the Ksat is moderately high to high (0.6 to 6.00 in/hr). Depth to the water table in these soils is approximately 36 to 72 inches. The typical profile is described as fine sandy loam to approximately 80 inches.
3. Newark silt loam, occasionally flooded (Ne): This soil type is found in flood plains. The mean annual precipitation is approximately 37 to 45 inches. Slope is approximately 0 to 2 percent. The soil somewhat poorly drained and the Ksat is 0.6 to 2.0 in/hr. Depth to the water table is approximately 6 to 18 inches. The soil profile is described as silt loam down to approximately 80 inches.

3.4.4 Physical Geology

The Subject Property, located in Coshocton County, is located on the Muskingum-Pittsburgh Plateau, in the Allegheny (Kanawha) Plateaus Section of the Appalachian Plateaus Province. The Muskingum-Pittsburgh Plateau consist s of moderately high to high relief (300 feet – 600 feet) dissected plateau having broad major valleys that contain outwash terraces, and tributaries with lacustrine terraces. Elevation is approximately 650 feet to 1,400 feet.

3.4.4.1 Bedrock Geology

The Geology is expected to be made up of Mississippian and Pennsylvanian-age siltstones, shales, sandstones and economically imported coals and clay stones as well as Wisconsinan-age sand, gravel, and lacustrine silt and silt loam colluvium.

3.4.4.2 Shallow Aquifer

The Subject Property is located in an area in which yields of more than 500 gallons per minute (gpm) may be developed. Groundwater is obtained from valley fill material that is predominantly composed of course, permeable, sand and gravel deposits. The valley fill material may extend to depth as great as 180 feet. In most areas this aquifer is hydraulically connected to the adjacent river (ODNR Groundwater Resources Map,

Sugar 1988). Water wells within ½ mile of the Subject Property are drilled into sand and gravel. Static water level in the area is approximately 26 feet below ground surface and groundwater wells in the area typically yield 298 gallons per minute (gpm) (ODNR Well Logs).

3.4.5 Wetlands

The Army Corps of Engineers and the Federal Environmental Protection Agency jointly define wetlands as:

> *Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.*

Based on observations made during the site inspection, the Subject Property contains wetland areas located at the northern portion of the parcel, extending approximately 720 feet south of the Tuscarawas River. According to the National Wetlands Inventory Map of Coshocton County, this fresh water forested/shrub wetland area is considered a Paulustrine Forested Broad-Leaved Deciduous Wetland. A wetlands map illustrating wetlands present in the vicinity of the Subject Property can be referenced in Figure 7.

4.0 PROPERTY USAGE

4.1 Current Uses of the Property

The metals fabricating and painting operations that were conducted at the Steel Ceilings facility ceased in November of 2004. The Subject Property and site building are currently vacant. The only operations taking place at the property are those associated with the environmental assessment.

4.2 Historic Uses of the Property

Based on historical research and interviews the Subject Property was first developed in the early 1900's by the Spellacy and Raff Company, manufacturers of enamel ware. The Beach Enamel company then occupied the Subject Property from at least the 1920's thru the 1930's. According to an interview with Mr. Dave Lear, former Maintenance Person at the Subject Property from 1985 to 2004, E.F. Houserman Corporation, a manufacturer of movable office walls, owned the property from 1946 until 1969. Airtite Contractors owned the facility from 1969 to 2000. Alliancin and Kanoe owned the property after 2000. Prior to Steel Ceilings operating at the facility, bullet proof gasoline tanks were manufactured at the facility by Firestone. Prior to Firestone, the Beach Enamel Company occupied the Subject Property. According to historic Sanborn Fire Insurance Maps, Steel Ceilings occupied the Subject Property beginning as early as 1962. According Polk City Directories, the Subject Property was also occupied by the Union 76 Co. bulk plant from approximately 1969 to 1975.

Historic City Directories were researched in an effort to determine former use of the Subject Property. The following table illustrates the former use, address, and reference source for the Subject Property as provided by EDR. The Subject Property was not listed in the provided EDR Historic City Directories prior to 1964 or after 2001. According to Historic City Directories a bulk facility owned by Union 76 Co. was present at the Subject Property from 1969 to 1975.

Year	Address	Listing	Reference Source
2001	500 North 3rd Street	Acousta Fab (plaster drywall)	Polk City Directory
		Steel Ceilings Division	
1996	500 North 3rd Street	Steel Ceilings Inc.	
1991	500 North 3rd Street	Steel Ceilings Inc.	
1986	500 North 3rd Street	Steel Ceilings Div.	
1981	500 North 3rd Street	Steel Ceilings Div.	
1975	500 North 3rd Street	Steel Ceilings Inc. (div of Airtex)	
		Union 76 Co. (bulk plant)	
1969	500 North 3rd Street	Steel Ceilings Inc. (div of Airtex)	
		Union 76 Co. (bulk plant)	
1964	500 North 3rd Street	Steel Ceilings Inc. (div of EF Hauserman Co.)	

4.2.1 Historical Topographic Map

Historical topographic maps dated 1915, 1961, 1978, 1985, 1992, and 1994 were obtained from EDR. The site building is fist depicted on the 1961 topographic map. There appear to have been no major changes recorded on historical topographic maps through 1994. Historical topographic maps are included as Appendix E.

4.2.2 Aerial Photographs

Aerial photographs dated 1973, 1976, 1982, 1985, 1994, 2005, and 2006 were obtained from EDR. Several aerial photographs are blurred however site buildings were visible in the 1973, 1994, 2005 and 2006 aerial photographs. Aerial photographs dated 1946, 1951, 1956, 1961, 1963, 1967, 1970, 1974, 1982, 1990, 1994, and 2004 were obtained from the Ohio Department of Transportation (ODOT) Department of Aerial Engineering. Aerial photographs are included as Appendix F. A summary review of the photographs is provided below:

1946: The Subject Property site building appears in its current configuration. Two (2) small shed type structures are visible to the northeast of the site buildings. Railroad tracks are visible immediately to the south of the site building. The land to the north of the site building (north of the northern loading dock) appears lighter in color and potentially disturbed. The building on the western adjoining property appears to be located south of the position observed during site reconnaissance. A potential waste

water outflow is visible extending from the eastern adjoining property, traversing the Subject Property in an east/west fashion and ending at the Tuscarawas River to the west. The Tuscarawas River is visible to the north and west of the Subject Property.

1951: There appear to have been no significant changes to the Subject Property since the 1946 aerial photograph. Several vehicles are parked to the west of the Subject Property site building. It appears that a potential flood of the Tuscarawas River may have caused significant land disturbance to the north of the site building and northeast of the Subject Property.

1956: There appear to have been no significant changes to the Subject Property since the 1951 aerial photograph.

1961: There appear to have been no major changes to the Subject Property since the 1956 aerial photograph. Significant construction has occurred at the eastern adjoining property.

1963: There appear to have been no significant changes to the Subject Property since the 1961 aerial photograph.

1967: A whitish substance is visible to the north of the Subject Property site building in the approximate location of a former waste water outfall. The property to the east of the Subject Property, Smurfit-Stone, appears to contain two (2) lagoons or settling ponds located northeast of the Subject Property on the southern bank of the Tuscarawas River.

1970: The white substance at the area of the former waste water outfall is visible but smaller. Only one (1) lagoon or settling pond appears at the eastern adjoining property.

1973: The Subject Property site building appears in its current configuration. There appear to be some areas of debris or containers located to the northeast and west of the site building. There appear to be areas of debris and land clearing to the northeast of the Subject Property site building at the eastern adjoining property.

1974: There are no longer areas of debris or containers visible at the Subject Property or adjoining property.

1976: The 1976 aerial photograph is blurred and only the site building outline is discernable on the Subject Property.

1982 (EDR): The 1982 aerial photograph is also blurred.

1982 (ODOT): The scale of the 1982 aerial photograph is such that site features are not clear.

1985: The 1985 aerial photograph is blurred.

1990: The scale of the 1990 aerial photograph is such that site features are not discernable. An air emissions source is present on the eastern adjoining property and is visible by the cloud of smoke or vapor depicted over it.

1994 (EDR): There appear to be no major changes to the Subject Property since the 1976 aerial photograph.

1994 (ODOT): The western adjoining site building appears to have been demolished and a new structure built immediately to the north of the previous structure. It appears that the railroad tracks identified in early aerial photographs are still present to the south of the Subject Property site building.

2004: The rail road tracks visible earlier aerial photographs to the south of the Subject Property site building appear to have been removed.

2005: There appear to have been no major changes to the Subject Property in the 2005 aerial photograph.

2006: There appear to have been no changes to the Subject Property or surrounding properties since the 2005 aerial photograph.

4.2.3 Sanborn Fire Insurance Maps

Sanborn Fire Insurance Maps were available for the years 1905, 1912, 1925, 1931, and 1962 from Environmental Data Resources for the Subject Property. A summary review of the maps is provided below:

1905: The Subject Property was mainly undeveloped in 1905. A gas holder is depicted at the western boundary of the Subject Property along Maple Street. Residential dwellings were located at the intersection of Fourth Street and Maple Street, at the southeastern corner of the Subject Property. The Subject Property was boarded to the south by Maple Street. The Pennsylvania Railroad traversed the landscape in an east/west fashion between Maple Street and Sycamore Street. A rail road spur extended to the north toward Maple Street and then ran parallel to the main rail line approximately 75 ft south of Maple Street. The Coshocton Gas Plant was depicted adjoining to the west of the Subject Property, at the north end of North Third Street, crossing Maple Street. A second rail road spur is located to the west of the Coshocton Gas Company.

1912: An approximately 22,500 sq ft building complex is located on the Subject Property. The building is occupied by the Spellacy and Raff Company, manufacturers of kitchen enamelware. A machine shop area is located at the northeastern portion of the building. The Coshocton Gas Company is located to the west of the Subject

Property. The former Gas Holder is labeled *Gasometer Not Used.* Residential dwellings are depicted at the intersection of North Fourth Street and Maple Street. A warehouse is located to the south of the residential dwellings north of the rail road spur. A topographical bank is depicted traversing the property to the north of the property building.

1925: The Subject Property was occupied by the Beach Enameling Company in 1925. Additions were constructed to the south (front), southwest and east of the factory building. A mill room (the former machine shop) is located in the center of the building structure. A decorating room is located to the north of the mill room. The new addition to the east is the occupied by a crate factory. The addition on the south side of the building is labeled *furnace room* and to the southeast is a wooden storage area. A free standing lumber building is located to the northeast of the main structure. Maple Street is no longer in existence and there are no longer dwellings at the end of North Fourth Street. The warehouse to the southeast of the main Subject Property building is still visible, as is the main line of the rail road traversing landscape in an east-west fashion approximately 150 ft to the south of the Subject Property building. However, the rail spur extending north from the main rail road is no longer depicted. The Gasometer is still depicted and is labeled *not used.*

1931: In 1931, the Beach Enamel Company still occupied the Subject Property. More additions were constructed to the northern, southern and western sides of the property. Two (2) free standing buildings appear in the 1931 Sanborn Map to the north of the main building structure. A large addition has been constructed to the south of the furnace and storage room. A small addition has been constructed to the west of the storage room. Small additions have been added to the east of the furnace room. In addition, three (3) fuel USTs are visible at the southeastern portion of the property, northeast of the vacant warehouse on North 4th Street.

1962: In 1962 the Subject Property was occupied by Steel Ceilings, Inc. Three (3) spray paint booths are depicted in the southerly most portion of the building. The former furnace room, located to the north of the paint booth area, is now labeled *press room.* The three (3) fuel tanks are still visible to the east of the Subject Property main building; however the vacant warehouse is no longer depicted.

4.2.4 Historical Ownership of the Subject Property

Based on historical research and interviews the Subject Property was first developed in the early 1900's by the Spellacy and Raff Company, manufacturers of enamel ware. The Beach Enamel Company then occupied the Subject Property from at least the 1920's thru the 1930's. According to an interview with Mr. Dave Lear, former Maintenance Person at the Subject Property from 1985 to 2004, E.F. Houserman Corporation, a manufacturer of movable office walls owned the property, from 1946 until 1969. Airtite Contractors owned the facility from 1969 to 2000. According to Mr. Lear Alliancin and Kanoe owned the property after 2000. A Warranty Deed (Appendix D) was provided by EDR and states the title is vested in 2900 Steel, LLC and was received by 2900 Corp. (assumed name Airtite/Steel Ceilings, I) on January 30, 2003. The Deed was recorded in Coshocton County on February 5, 2003.

4.3 Proposed Use of the Property

The proposed use of the Subject Property is to be redeveloped into an economically beneficial property utilized for light industrial facilities.

4.4 Current and Past Uses of Adjoining Properties

Current and past uses of adjoining properties were visually and physically observed on the site visit, identified in interviews and record reviews or through client provided information, and are identified below:

The Subject Property is bordered to the north by the Tuscarawas River. The Stone Mill Operating Corporation owns the properties to the east, south and southwest of the Subject Property. Smurfit-Stone, Container Division, an industrial paper mill facility, is

located adjoining to the east. The property owned by Smurfit-Stone to the south of the Subject Property consists of a parking area with a busy drive way beyond. Smurfit-Stone offices are located to the south beyond the parking area and drive way. The area located to the southwest is used for semi truck parking. The property to the west of the Subject Property is owned and occupied by Columbia Gas of Ohio. Six (6) groundwater monitoring wells were identified at the boundary between Columbia Gas and the Subject Property. The groundwater monitoring wells appear to be situated in the former location of a gas holding tank identified in Sanborn Fire Insurance Maps from 1905 – 1931. The Coshocton Water Treatment Plant is located approximately 310 feet to the west of the Subject Property.

Historic City Directories were also researched in an effort to determine current and past use of the adjoining properties. The following table illustrates the former use, address, and reference source for the adjoining commercial properties as was provided by EDR. The property to the east of the Subject Property has been occupied by Smurfit Stone Container since at least 1964. The property to the west has been occupied by Columbian Gas of Ohio Inc. since at least 1964. Stone Container has occupied the property to the south of the Subject Property since at least the early 1990's.

Year	Address	Listing	Reference Source
2010	500 North 4th Street	No Listing	Polk City Directory
	415 North 3rd Street	Residential	
	421 North 3rd Street	No Listing	
	450 North 3rd Street	Stone Container Forest Prod. Div.	
	501 North 3rd Street	CNG Auto	
		Royalty Enterprises	
	503 North 3rd Street	No Listing	
	504 North 3rd Street	No Listing	
	505 North 3rd Street	No Listing	
	515 North 3rd Street	No Listing	
2006	500 North 4th Street	Smurfit Stone Container Division	Polk City Directory
	415 North 3rd Street	Residential	
	421 North 3rd Street	No Listing	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	Auto Sales CNG	
		Royalty Enterprises	

	503 North 3rd Street	No Listing	
	504 North 3rd Street	NGO Development Corp.	
	505 North 3rd Street	No Listing	
	515 North 3rd Street	No Listing	
2001	500 North 4th Street	Smurfit Stone	
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	Auto Sales CNG	
		Royalty Enterprises	
	503 North 3rd Street	No Listing	
	504 North 3rd Street	NGO Development Corp.	
	505 North 3rd Street	No Listing	
	515 North 3rd Street	No Listing	
1996	500 North 4th Street	Smurfit Stone Corp.	
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	Stone Container Forest Prod. Div.	
	501 North 3rd Street	No Listing	
	503 North 3rd Street	No Listing	
	504 North 3rd Street	NGO Development Corp.	
	505 North 3rd Street	No Listing	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	
1991	500 North 4th Street	No Listing	
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	Stone Container Forest Prod. Div.	
	501 North 3rd Street	Hughes Heating and Cooling Repairs	
	503 North 3rd Street	No Listing	
	504 North 3rd Street	Stone Resource and Energy Corp.	
	505 North 3rd Street	No Listing	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	
1986	500 North 4th Street	Stone Container Corp.	
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	Hughes Oil Company	
	503 North 3rd Street	No Listing	
	504 North 3rd Street	Stone Resource and Energy Corp.	
	505 North 3rd Street	Bennett Oil Co.	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	
1981	500 North 4th Street	Stone Container Corp.	Polk City Directory
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	Hughes Oil Company	

	503 North 3rd Street	No Listing	
	504 North 3rd Street	Stone Resource and Energy Corp.	
	505 North 3rd Street	Bennett Oil Co.	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	
1975	500 North 4th Street	Stone Container Corp.	
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	No Listing	
	503 North 3rd Street	Vacant	
	504 North 3rd Street	Vacant	
	505 North 3rd Street	Atlantic Richfield Refining	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	
1969	500 North 4th Street	Stone Container Corp.	
	415 North 3rd Street	Residential	
	421 North 3rd Street	Residential	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	Pure Oil Co.	
		Zingg Oil Co.	
	503 North 3rd Street	Residential	
	504 North 3rd Street	Texaco Inc.	
	505 North 3rd Street	Sinclair Refining Oil	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	
1964	500 North 4th Street	Stone Container Corp.	
	415 North 3rd Street	Residential	
	421 North 3rd Street	No Return	
	450 North 3rd Street	No Listing	
	501 North 3rd Street	Pure Oil Co.	
		Zingg Oil Co.	
	503 North 3rd Street	Residential	
	504 North 3rd Street	Texaco Inc.	
	505 North 3rd Street	Sinclair Refining Oil	
	515 North 3rd Street	Columbian Gas of Ohio Inc.	

5.0 ENVIRONMENTAL REGULATORY RECORDS REVIEW

5.1 Standard Federal and State Environmental Record Sources

A search of available environmental records was conducted by Environmental Data Resources (EDR) in order to delineate the presence of facilities that may have contributed to the potential for hazardous substances or petroleum underlying or emanating from the Subject Property. For the purpose of the VAP, all potential sources within ½ mile of the Subject Property must be considered. Search distances were expanded for potential sources listed on databases for which the ASTM recommended search distance is greater than ½ mile. Sites identified within this approximate minimum search distance (AMSD) from the federal and state environmental records database listings are presented in the following table. Each identified property is discussed in detail in the Database Findings section of this report. Please see Appendix C for the EDR database report.

Environmental Data Resources Database Query Results

Federal/State/Tribal/Proprietary Database Search Results				
Database	**AMSD**	**Total Sites**	**On Subject Property**	**Data Source**
NPL	1.0 mile	0	0	EDR - Federal ASTM Standard Records
Proposed NPL	1.0 mile	0	0	EDR - Federal ASTM Standard Records
Delisted NPL	1.0 mile	0	0	EDR - Federal ASTM Standard Records
NPL LIENS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
CERCLIS	0.5 mile	1	0	EDR - Federal ASTM Standard Records
CERC-NFRAP	0.5 mile	1	1	EDR - Federal ASTM Standard Records
LEINS 2	0.5 mile	0	0	EDR - Federal ASTM Standard Records
CORRACTS	1.0 mile	1	1	EDR - Federal ASTM Standard Records
RCRA TSDF	0.5 mile	1	1	EDR - Federal ASTM Standard Records
RCRA LQG	0.5 mile	0	0	EDR - Federal ASTM Standard Records
RCRA SQG	0.5 mile	1	0	EDR - Federal ASTM Standard Records
RCRA CESQG	0.5 mile	8	0	EDR - Federal ASTM Standard Records
RCRA NON-GEN	0.5 mile	1	1	EDR - Federal ASTM Standard Records
US ENG CONTROLS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
US INST CONTROL	0.5 mile	0	0	EDR - Federal ASTM Standard Records
ERNS	0.5 mile	4	0	EDR - Federal ASTM Standard Records
HMIRS	0.5 mile	0	0	EDR - Federal ASTM Standard Records

DOT OPS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
US CDL	0.5 mile	0	0	EDR - Federal ASTM Standard Records
US BROWNFIELDS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
DOD	1.0 mile	0	0	EDR - Federal ASTM Standard Records
FUDS	1.0 mile	0	0	EDR - Federal ASTM Standard Records
LUCIS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
CONSENT	1.0 mile	0	0	EDR - Federal ASTM Standard Records
ROD	1.0 mile	0	0	EDR - Federal ASTM Standard Records
UMTRA	0.5 mile	0	0	EDR - Federal ASTM Standard Records
ODI	0.5 mile	0	0	EDR - Federal ASTM Standard Records
DEBRIS REGION 9	0.5 mile	0	0	EDR - Federal ASTM Standard Records
MINES	0.5 mile	0	0	EDR - Federal ASTM Standard Records
TRIS	0.5 mile	1	0	EDR - Federal ASTM Standard Records
TSCA	0.5 mile	0	0	EDR - Federal ASTM Standard Records
FTTS	TP	0	0	EDR - Federal ASTM Standard Records
HIST FTTS	0.5 mile	1	0	EDR - Federal ASTM Standard Records
SSTS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
ICIS	0.5 mile	1	0	EDR - Federal ASTM Standard Records
PADS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
MLTS	0.5 mile	2	0	EDR - Federal ASTM Standard Records
RADINFO	0.5 mile	0	0	EDR - Federal ASTM Standard Records
FINDS	0.5 mile	31	1	EDR - Federal ASTM Standard Records
RAATS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
SCRD DRYCLEANERS	0.5 mile	0	0	EDR - Federal ASTM Standard Records
DERR	1.0 mile	1	1	EDR – State/Local ASTM Standard Records
TOWNGAS	1.0 mile	0	0	EDR – State/Local ASTM Standard Records
UIC	0.5 mile	17	0	EDR - State/Local ASTM Standard Records
SWF/LF	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
HIST LF	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
LUST	0.5 mile	20	0	EDR – State/Local ASTM Standard Records
UNREG LTANKS	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
UST	0.5 mile	21	0	EDR – State/Local ASTM Standard Records
ARCHIVE UST	0.5 mile	1	0	EDR – State/Local ASTM Standard Records
SPILLS	0.5 mile	17	0	EDR – State/Local ASTM Standard Records
ENG CONTROLS	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
INST CONTROL	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
VCP	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
DRYCLEANERS	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
BROWNFIELDS	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
NPDES	0.5 mile	1	0	EDR – State/Local ASTM Standard Records
CDL	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
USD	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
HIST ENG CONTROLS	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
HIST USD	0.5 mile	0	0	EDR – State/Local ASTM Standard Records
HIST INST CONTROLS	0.5 mile	0	0	EDR – State/Local ASTM Standard Records

INDIAN RESERV	1.0 mile	0	0	EDR - Tribal ASTM Records
INDIAN LUST	0.5 mile	0	0	EDR - Tribal ASTM Records
INDIAN UST	0.25 mile	0	0	EDR - Tribal ASTM Records
INDIAN VCP	0.5 mile	0	0	EDR - Tribal ASTM Records
Manufactured Gas Plants	1.0 mile	2	0	EDR - Proprietary Records

5.2 Discussion of Database Findings

5.2.1 Federal ASTM Standard Records

5.2.1.1 National Priorities List (NPL)

The National Priorities List is the EPA's database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program. A site must meet or surpass a predetermined hazard ranking system score, be chosen as a state's top priority site, or meet three specific criteria. The Subject Property was not identified on the NPL database and there were no properties identified within a 1-mile radius from the Subject Property on the NPL database.

5.2.1.2 Proposed NPL

The US EPA maintains the Proposed NPL. The Subject Property was not identified on the Proposed NPL database and there were no properties identified within a 1 -mile radius from the Subject Property on the Proposed NPL database.

5.2.1.3 National Priorities List Delisted (NPL Delisted)

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425 (e), sites may be deleted from the NPL where no further response is appropriate. The Subject Property was not identified on the NPL Delisted database and there were no properties identified within a 1 -mile radius from the Subject Property on the NPL Delisted database.

5.2.1.4 Federal Superfund Liens (NPL Liens)

Under the authority granted to the US EPA by CERCLA of 1980, the US EPA has the authority to file liens against real property in order to recover remedial action

expenditures or when the property owner received notification of potential liability. US EPA compiles a listing of filed notices of NPL Liens. The Subject Property was not identified on the NPL Liens database and there were no properties identified within a 1-mile radius from the Subject Property on the NPL Liens database.

5.2.1.5 Comprehensive Environmental Response, Compensations, and Liability Information System (CERCLIS)

CERCLIS contains data on potentially hazardous waste sites that have been reported to the US EPA by states, municipalities, private companies, and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL. The Subject Property was identified on the CERCLIS database. One (1) property was identified within a 1-mile radius from the Subject Property on the CERCLIS database.

Equal/Higher Elevation

•	Park Hotel	325 Main Street	0.345 mi S

The Ohio EPA requested assistance with a time-critical removal action assessment at the former Park Hotel site. The hotel burnt to the ground on July 10, 2005. Several retail stores including a paint store were buried in the rubble. Unknown quantities of solvents and points were covered with debris. The building was assessed for asbestos in 2000 and the debris was to have been classified asbestos containing material waste. According to the CERCLIS database, as of April 2006 the priority level was listed as cleaned up.

5.2.1.6 CERC No Further Remedial Action Planned (CERC-NFRAP)

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the NPL, unless information indicates this decision was

not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site. The Subject Property was identified on the CERC-NFRAP database. There were n other properties identified within a ½-mile radius from the Subject Property on the CERC-NFRAP database.

- Steel Ceilings Incorporated 500 North 3rd Street Subject Property

A preliminary assessment was completed in 1994 and deferred to RCRA. The report is summarized in section 2.3.6 of this report. The site was archived in December of 1995.

5.2.1.7 CERCLA Lien Information (LIENS 2)

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties. The Subject Property was not identified LIENS 2 database and there were no properties identified within a ½-mile radius from the Subject Property on the LIENS 2 database.

5.2.1.8 Corrective Action Report (CORRACTS)

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity. The Subject Property was identified on the CORRACTS database. There were no other properties identified within a 1-mile radius from the Subject Property on the CORRACTS database.

- Steel Ceilings Incorporated 500 North 3rd Street Subject Property

The entire Steel Ceilings facility (EPA OHD047976063) was assigned a medium corrective action priority in March of 1994.

5.2.1.9 Resource Conservation and Recovery Act Information (RCRAInfo)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. This database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the RCRA. Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste. RCRA Non-Generators do not *presently* generate any hazardous waste.

The Subject Property was identified as a RCRA TSDF and RCRA Non-Generator. One (1) property was identified as a SQG within the ½ mile search distance, and eight (8) properties were identified as CESQGs within the ½ mile search distance. There were no LQGs identified within ½ mile of the Subject Property.

Treatment Storage and Disposal Facilities

• Steel Ceilings Incorporated	500 North 3rd Street	Subject Property

Small Quantity Generators

Equal/Higher Elevation

• Brillhart A Body Shop	622 Main Street	0.417 mi SSE

Conditionally Exempt Small Quantity Generators

Equal/Higher Elevation

• Columbia Gas of Ohio	515 N 3rd St.	0.055 mi SSW
• Smurfit-Stone Container Ent.	500 N 4th St.	0.068 mi S

• Chestnut Auto Body Inc.	512 Chestnut St.	0.273 mi SSE
• Coshocton Street Dept.	760 Chestnut St.	0.438 mi SE
• Coshocton Brake & Supply	601 Walnut St.	0.487 mi SSE

Lower Elevation

• Coshocton Collision Center	225 Main St.	0.353 mi SSW
• NAPA Coshocton Automotive	123 S. 2nd St.	0.381 mi SSW
• Dreher's Auto Service	15 Walnut St.	0.499 mi SSW

RCRA Non-Generators

Equal/Higher Elevation

• Steel Ceilings Incorporated	500 North 3rd Street	Subject Property

Due to the large number of facilities returned in this search, only the addresses that were located on the Subject Property or on adjacent properties are discussed below. However, the entire report with all of the returned addresses can be referenced in Appendix C.

The Steel Ceilings facility received several written informal notices of violation dating between 1986 and 2004 related to general and pre-transport violations. The Subject Property was the focus of several on-site compliance investigations between 1985 and 2004. The property is currently a RCRA Non-generator.

A Freedom of Information Act (FOIA) request to review files was completed with the Ohio EPA Southeast District Office (SEDO). According to files obtained from the Ohio EPA SEDO, the Subject Property was a RCRA Treatment, Storage and Disposal Facility (TSDF) until April of 1983 because of storage activities greater than the 90 day limit. The facility did not treat or dispose of hazardous waste on the Subject Property. Closure activities took place from December of 1982 through January of 1983 and included the removal of approximately 100 drums of hazardous waste and 26 cubic yards of trichloroethylene (TCE) contaminated soil from an onsite drum storage area to an off-site facility. Steel Ceilings sent certification to finalize the closure of the drum storage area was to the U.S. EPA on March 15, 1983. On April 19, 1983 a letter was

sent to Steel Ceilings from the U.S. EPA stating closure was accomplished and the facility was compliant with 40 CFR 262.34; Steel Ceilings was considered a generator only. The facility remained a Large Quantity Generator (LQG) of Hazardous Wastes including paint waste and chlorinated solvents until April 4, 1996 when the RCRA classification was changed to Conditionally Exempt Small Quantity Generator (CESQG). During that time, Steel Ceilings generated quantities of waste that could have classified them as either a Small Quantity Generator or a LQG. The company preferred to be listed as a LQG to eliminate the possibility of frequent re-notification of generator status. According to comments made during a RCRA inspection on March 26, 1996 Steel Ceilings discontinued the use of TCE in July 1994. TEC was replaced with a non-hazardous, water based solution at that time. The elimination of the TCE waste stream reclassified Steel Ceilings from a LQG to a CESQG. During the time of the March 26, 1996 inspection the only hazardous waste being generated at the facility was waste naptha solvents from painting operations at a rate of approximately 55 gallons/year.

PRC Environmental Management, Inc. (PRC), under contract with the U.S. EPA, performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Steel Ceilings facility. The report was provided by the U.S. EPA Region 5 Superfund Division in response to a Freedom of Information Act (FOAI) request for files. The report was also received in documents provided by the U.S. EPA Region 5 Land and Chemicals Division. The assessment and inspection revealed evidence of eight (8) SWMUs and four (4) AOCs. Included in documentation provided by the Region 5 LCD was a letter addressed to Steel Ceilings Inc. from U.S. EPA Region 5 dated April 5, 2007. The correspondence stated that the property will need to be addressed under the RCRA Corrective Action Program and a final remedy is expected to be in place at the facility by 2020.

The Columbia Gas of Ohio facility is located adjacent to the west of the Subject Property. Columbia Gas of Ohio was a generator or is currently generating small, conditionally exempt quantities of ignitable hazardous wastes, corrosives, barium, lead, mercury, benzene and spent halogenated and non-halogenated solvents. No violations have been found in connection with the Columbia Gas of Ohio property. The Smurfit-Stone Container Enterprises, Inc. property is located adjacent and to the east of the Subject Property. Smurfit-Stone Container is listed as a CESQG of ignitable hazardous wastes, mercury, and spent halogenated and non-halogenated solvents. The facility received three (3) written, informal notices of violation dating 1994, 2002 and 2008 and was the subject of on-site compliance evaluation inspections in 1990, 1994, and 2008. Spills have been reported at the Smurfit-Stone Container property including four (4) waste water spills dating from 1992, 1993, 1996, and 2003. A spill of pulping liquor was reported in 1992.

5.2.1.10 United States Engineering Controls (US ENG CONTROLS)

US ENG CONTROLS is a listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or affect human health. The Subject Property was not identified on the US ENG CONTROLS database and there were no properties identified within a ½-mile radius from the Subject Property on the US ENG CONTROLS database.

5.2.1.11 United States Institutional Controls (US INST CONTROLS)

US INST CONTROLS is a listing of sites with institutional controls. Institutional controls include administrative measures, such as groundwater use restriction, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls. The Subject Property was not identified on the US INST CONTROLS database and there were no properties identified within a ½-mile radius from the Subject Property on the US INST CONTROLS database.

5.2.1.12 Emergency Response Notification System (ERNS)

ERNS records and stores information on reported releases of oil and hazardous substances. The Subject Property was not identified on the ERNS database. There were 4 additional listing on the ERNS database all of which were located at same adjacent property.

Equal/Higher Elevation

• 500 North 4th St.	500 North 4th St.	0.067 mi S
• 500 N 4th St.	500 N 4th St.	0.067 mi S
• 500 North 4th St.	500 North 4th St.	0.067 mi S
• 500 N 4th St.	500 N 4th St.	0.067 mi S

5.2.1.13 Hazardous Materials Information Reporting System (HMIRS)

HMIRS contains hazardous material spills reported to DOT. The Subject Property and adjacent properties were not identified on the HMIRS database, there were no properties identified within a ½-mile radius from the Subject Property on the HMIRS database.

5.2.1.14 Incident and Accident Data (DOT OPS)

The DOT OPS database contains information from the Department of Transportation, Office of Pipeline Safety Incident and Accident data. The Subject Property was not identified on the DOT OPS database and there were no properties identified within the ½-mile radius from the Subject Property on the DOT OPS database.

5.2.1.15 Clandestine Drug Labs (CDL)

The U.S. Department of Justice provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals of other items that indicated the presence of either clandestine drug labs or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments. The Subject Property was not identified on

the CDL database and there were no properties listed on the CDL database within a ½ mile radius from the Subject Property.

5.2.1.16 United States Brownfield Sites (US BROWNFIELDS)

US BROWNFIELDS is a listing of Brownfield property addresses by Cooperative Agreement Recipients and Brownfield properties addressed by Targeted Brownfield Assessments. The Subject Property was not identified on the US BROWNFIELDS database and there were no properties identified within a ½-mile radius from the Subject Property on the US BROWNFIELDS database.

5.2.1.17 Department of Defense Sites (DOD)

The DOD database consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico and the U.S. Virgin Islands. The Subject Property was not identified on the DOD database and there were no properties identified within a 1-mile radius from the Subject Property on the DOD database.

5.2.1.18 Formerly Used Defense Sites (FUDS)

FUDS includes listings of formerly used defense sites properties where the U.S. Army Corps of Engineers is actively working or will take necessary cleanup actions. The Subject Property was not identified on the FUDS database and there were no properties identified within a 1-mile radius from the Subject Property on the FUDS database.

5.2.1.19 Land Use Control Information System (LUCIS)

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties. The Subject Property was not identified on the LUCIS database and there were no properties identified within a ½-mile radius from the Subject Property on the LUCIS database.

5.2.1.20 Superfund Consent Decrees (CONSENT)

This list consists of major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) Sites. This list is released periodically by U.S. District Courts after settlement by parties to litigation matters. The Subject Property was not

identified on the CONSENT database, and there were no properties identified within a 1-mile radius from the Subject Property on the CONSENT database.

5.2.1.21 Records of Decision (ROD)

The ROD documents mandate a permanent remedy at an NPL (Superfund) site and contain technical and health information to aid in the clean up. The Subject Property was not identified on the ROD database and there were no properties identified within a 1-mile radius from the Subject Property on the ROD database.

5.2.1.22 Uranium Mill Tailings Site (UMTRA)

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized. The UMTRA database lists sites where mill tailings are present. The Subject Property was not identified on the UMTRA database and there were no properties identified within a ½-mile radius from the Subject Property on the UMTRA database.

5.2.1.23 Open Dump Inventory (ODI)

The ODI lists open dump areas. An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or 258 Subtitle D criteria. The Subject Property was not identified on the ODI database and there were no properties identified within a ½-mile radius from the Subject Property on the ODI database.

5.2.1.24 Mines Master Index File (MINES)

The MINES database contains all mine identification numbers issued for mines active or opened since 1971. The Subject Property was not identified on the MINES database and there were no properties identified within a ½-mile radius from the Subject Property on the MINES database.

5.2.1.25 Toxic Chemical Release Inventory System (TRIS)

TRIS identifies facilities which release toxic chemicals to the air, water, and land in reportable quantities under SARA Title III Section 313. The Subject Property was not identified on the TRIS database, however there was one (1) property identified on the TRIS database within ½ -mile of the Subject Property.

Equal/Higher Elevation

- Smurfit-Stone Container Ent. 500 N 4th St. 0.068 mi S

The Stone Container facility releases or has released lead compounds, acetaldehyde, dioxin and dioxin like compounds, and methanol as air emissions and to the adjacent Tuscarawas River.

5.2.1.26 Toxic Substance Control Act (TSCA)

TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site. The Subject Property was not identified on the TSCA database and there were no properties identified within a ½-mile radius from the Subject Property on the TSCA database.

5.2.1.27 FIFRA/TSCA Tracking System (FTTS)

FTTS is a database which tracks administrative cases and pesticide enforcement actions and compliance activities related to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), TSCA, and the Emergency Planning and Community Right to Know Act (EPCRA). The Subject Property was not identified on the FTTS database.

5.2.1.28 FIFRA/TSCA Tracking System Administrative Case Listings(HIST FTTS)

The HIST FTTS (October 2006) database is a complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA and TSCA. Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA

Headquarters with updated records, it was decided to create a HIST FTTS database. It includes records that may not be included in the newer FTTS database updates. This database is no longer updated. The Subject Property was not identified on the HIST FTTS database, however there was one adjacent property identified within a ½-mile radius from the Subject Property on the HIST FTTS database.

Equal/Higher Elevation

- Smurfit-Stone Container Ent. 500 N 4th St. 0.068 mi S

5.2.1.29 Section 7 Tracking Systems (SSTS)

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1 of each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produces and sol or distributed in the past year. The Subject Property was not identified on the SSTS database and there were no properties identified within a ½-mile radius from the Subject Property on the SSTS database.

5.2.1.30 Integrated Compliance Information System (ICIS)

The ICIS supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination system. The Subject Property was not identified on the ICIS database however one (1) property within a ½-mile radius was identified on the ICIS database.

Equal/Higher Elevation

- Smurfit-Stone Container Ent. 500 N 4th St. 0.068 mi S

The Smurfit-Stone Container facility has been the subject of several enforcement actions.

5.2.1.31 PCB Activity Database System (PADS)

PADS is a database that identifies generators, transporters, commercial storers, and/or brokers and disposers of PCBs who are required to notify the EPA of such activities. The Subject Property was not identified on the PADS database and there were no properties identified within a ½-mile radius from the Subject Property on the PADS database.

5.2.1.32 Material Licensing Tracking System (MLTS)

MLTS is a database maintained by the Nuclear Regulatory Commission (NRC) and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC regulations. The Subject Property was not identified on the MLTS database, however there were two (2) listings for the same adjacent listed on the MLTS database. There were no other properties within a ½-mile radius listed on the MLTS database.

Equal/Higher Elevation

•	Smurfit-Stone Container Ent.	500 N 4th St.	0.068 mi S
•	Smurfit-Stone Container Ent.	500 N 4th St.	0.068 mi S

The Smurfit-Stone Container facility held a license to possess or use radioactive materials from 1993 through 2003. According to the MLTS database report provided by EDR, the material was not stored, redistributed, incinerated or buried at the Smurfit-Stone Container property.

5.2.1.33 Radiation Information Database (RADINFO)

The RADINFO (July 2008) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity. The Subject Property was not identified on the RADINFO database and there were no properties within a ½-mile radius of the Subject Property identified on the RADINFO database.

5.2.1.34 Facility Index System/Facility Registry System (FINDS)

FINDS contains both facility information and "pointers" to other sources that contain more detail. The following databases included are PCS, AIRS, DOCKET, FURS, C-DOCKET, FFIS, STATE, and PADS. The Subject Property was identified on the FINDS database. There were thirty-one (31) properties within ½-mile of the Subject Property listed on the FINDS database, three (3) of which are located adjacent to the Subject Property.

Equal/Higher Elevation

• Steel Ceilings Incorporated	500 N 3rd St.	Subject Property
• Columbia Gas of Ohio	515 N 4th St.	0.055 mi SSW
• NGO Development Corp.	504 N. 3rd St.	0.057 mi SSW
• Smurfit-Stone Container Ent.	500 N 4th St.	0.068 mi S

Due to the large number of facilities returned in this search of the area, only the listings containing addresses that were located adjacent to the Subject Property are discussed bellow. However, the entire report with all of the returned addresses can be referenced in Appendix C.

The Subject Property was listed on FINDS databases including U.S. EPA TRIS, RCRAInfo, and OH-CORE. The Columbia Gas of Ohio Property was listed on the RCRAInfo database. The NGO Development Corp property was listed on the OH-CORE database which contains information commonly shared among the Ohio EPA environmental programs. The information is facility-based, general in nature, and used to support specific programmatic systems while simultaneously maintaining an inventory of common facility-related data. Specific programmatic details are maintained in programmatic databases. The Smurfit-Stone Container Corp was listed several FINDS databases including the Aerometric Information Retrieval System database, National Compliance Database, National Emissions Inventory, TRIS, RCRAInfo, OH-CORE, ICIS, Permit Compliance System, and the US EPA Clearinghouse RBLC database which contains case-specific information on the "Best Available" air pollution

technologies that have been required to reduce the emission of air pollutants from stationary sources.

5.2.1.35 RCRA Administrative Action Tracking System (RAATS)

RAATS contains records based on enforcement actions issued under RCRA pertaining to major violations and includes administrative and civil actions brought by the EPA. The Subject Property was not identified on the RAATS database and there were no properties identified within a ½-mile radius from the Subject Property on the RAATS database.

5.2.1.36 State Coalition for Remediation of Drycleaners Listing (SCRD DRYCLEANERS)

The SCRD DRYCLEANERS database was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin. The State of Ohio is not a member.

5.2.2 State ASTM Standard Records

5.2.2.1 Solid and Hazardous Waste Sites (SHWS) Records

The State of Ohio does not maintain a SHWS list and users should refer to the Federal CERCLIS list and Federal NPL list for information regarding solid and hazardous waste site records. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are indentified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state. Information from this database was not available.

5.2.2.2 Division of Emergency & Remedial Response's (DERR) Database

The DERR listings contain sites from all of Ohio that are in the DERR database, which is an index of sites whereby District Offices maintain files for. Not all sites are contaminated, and a site's absence from the database does not imply that is uncontaminated. The Subject Property was identified on the DERR database. There were no further properties within a 1-mile database of the Subject Property identified on the DERR database.

Equal/Higher Elevation

- Steel Ceilings Incorporated 500 N 3rd St. Subject Property

The Subject Property is listed as a DERR facility and falls within the jurisdiction of the Ohio EPA Southeast District Office (SEDO). A Freedom of Information Act (FOIA) was filed with the Ohio EPA SEDO and is reviewed in the appropriate sections of this report.

5.2.2.3 Master Sites List (MSL)

The MSL is no longer maintained or published by the Ohio EPA. It was a list of sites with well known or suspected contamination. A listing does not constitute a determination that any site identified in the report is or may be contaminated. The Subject Property is not identified on the MSL database and there were no properties identified within a 1-mile radius from the Subject Property on the MSL database.

5.2.2.4 DERR Town Gas Database (TOWNGAS)

TOWNGAS is a database that includes 82 very old sites (circa 1895) which produced gas from coal for street lighting. Most visual evidence of these sites has disappeared, however the potential for buried coal tar remains. The Subject Property was not identified on the TOWNGAS database and there were no properties identified within a 1-mile radius from the Subject Property on the TOWNGAS database.

5.2.2.5 Underground Injection Wells Listing (UIC)

UIC is a database of underground injection wells. The Subject Property was not identified on the UIC database however there were seventeen (17) properties identified within a ½ -mile radius from the Subject Property on the UIC database.

Equal/Higher Elevation

• Auto Sales LTD	201 N 3rd St.	0.057 mi SSW
• Lees Glass Service Inc.	313 N 5th St.	0.179 mi SSE
• Ferris Buick	229 N 3rd St.	0.224 mi S
• Rescue Squad	513 Chestnut	0.273 mi SSE
• Chestnut Auto	512 Chestnut St.	0.273 mi SSE
• Princes Wrecker Service	134 N 5th St.	0.329 mi SSE
• Hilltop Auto Sales	121 S. 3rd St.	0.365 mi S
• Jays Dream Detail	139 S 3rd St.	0.384 mi S
• Brillharts Body Shop Across	622 Main St.	0.417 mi SSE
• Coshocton Brake & Supply	601 Walnut St.	0.487 mi SSE

Lower Elevation

• Lauvrays Hauling and Towing	23749 CR 621	0.285 mi NNE
• Tansky's Quality Cars	105 N 2nd St.	0.355 mi SSW
• Lauvray's Pennzoil Service	213 Main St	0.356 mi SSW
• Hardesty Extended Auto Care	2nd/Main	0.359 mi SSW
• Rays Auto Mach Rear	134 Main St.	0.378 mi SSW
• Kwik Fill #S242/287	209 S 2nd St.	0.459 mi SSW
• Baird Concrete Supply	15 Walnut St	0.499 mi SSW

5.2.2.6 Licensed Solid Waste Facilities (SWF/LF)

The SWF/LF is an inventory of solid waste disposal facilities or landfills in the State of Ohio. These facilities may be active, inactive, or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. The Subject Property and adjacent properties were not identified on the SWF/LF database, and there were no properties identified within a ½-mile radius from the Subject Property on the SWF/LF database.

5.2.2.7 Old Solid Waste Landfill (HIST LF)

The HIST LF is a listing of about 1,200 old abandoned dumps or landfills. The Subject Property was not identified on the HIST LF database and there were no properties identified within a ½-mile radius from the Subject Property on the HIST LF database.

5.2.2.8 Leaking Underground Storage Tank Database (LUST)

LUST is a state database that keeps an inventory of petroleum release incidents. A No Further Action Letter (NFA) issued by the State Fire Marshal/Bureau of Underground Storage Tank Regulations (SFM/BUSTR) is the ultimate goal of this corrective action process. The Subject Property was not identified on the LUST database. There were 20 properties identified within a ½-mile radius from the Subject Property.

Equal/Higher Elevation

• Stone Energy & Resource Group	504 N 3rd St	0.056 mi SSW
• Smurfit-Stone Container	500 N 4th St	0.068 mi S
• Ferris Buick	229 N 3rd St	0.224 mi S
• Coshocton Street Dept	228 N 5th St	0.246 mi SSE
• Coshocton County Garage #1	324 Chestnut St	0.250 mi S
• Princes Wrecker Service	134 N 5th St	0.329 mi SSE
• High Caliber Pit Shop	629 Chestnut St	0.343 mi SE
• Dairy Mart #5355	353 Walnut St	0.441 mi S
• Former Beutenmiller, Inc.	455 R Walnut St	0.443 mi S
• JII/Sales Promotion Assoc. In	545 Walnut St	0.469 mi SSE
• Estate of James V. Gute	233 S 4th St	0.471 mi S

Lower Elevation

• Coshocton Water Dept.	118 Bridge St	0.168 mi W
• Vacant Commercial Site	190 Chestnut St	0.276 mi SSW
• Vacant Commercial Site	190 Chestnut St	0.276 mi SSW
• Baird Concrete Products, Inc.	15 Locust St	0.288 mi WSW
• Lauvray's Pennzoil Service	213 Main St	0.356 mi SSW
• Former Sunoco Station	202 Main St	0.359 mi SSW
• BP Oil Co. #08276	136 Main St	0.377 mi SSW
• Kwik Fill #S242/287	209 S 2nd St	0.459 mi SSW
• Baird Concrete Supply	15 Walnut St	0.499 SSW

No Further Action letters were issued for all of these UST systems except for the Dairy Mar #5355 facility where a release was disproved. A FOIA request was submitted to the SFM/BUSTR in order to obtain files the Stone Energy Resource Group and Smurfit Stone Properties. BUSTR files are available for review as Appendix I of this report.

5.2.2.9 Ohio Leaking UST Database (UNREG LTANKS)

UNREG L TANKS is a list of suspected or confirmed releases of petroleum from a non-regulated UST. The Subject Property was not identified on the UNREG LTANKS database, and there were no properties identified within a ½-mile radius from the Subject Property on the UNREG L TANKS database.

5.2.2.10 Underground Storage Tank Database (UST)

The UST database contains registered USTs. USTs are regulated under Subtitle I of the Resource Recovery and Conservation Act (RCRA) and must be registered with the SFM/BUSTR. The Subject Property was not identified on the UST database. There 21 properties identified within a ½-mile radius from the Subject Property.

Equal/Higher Elevation

• Stone Energy & Resource Group	504 N 3rd St	0.056 mi SSW
• Stone Container	500 N 4th St	0.068 mi S
• Ferris Buick	229 N 3rd St	0.224 mi S
• Coshocton Street Dept	228 N 5th St	0.246 mi SSE
• Coshocton County Garage #1	324 Chestnut St	0.250 mi S
• Princes Wrecker Service	134 N 5th St	0.329 mi SSE
• High Caliber Pit Shop	629 Chestnut St	0.343 mi SE
• Dairy Mart #5355	353 Walnut St	0.441 mi S
• JII/Sales Promotion Assoc. In	545 Walnut St	0.469 mi SSE
• Estate of James V. Gute	233 S 4th St	0.471 mi S

Lower Elevation

• Coshocton Water Dept.	118 Bridge St	0.168 mi W
• Iamiello BP	205 Chestnut St.	0.269 mi SSW
• Vacant Property	Chestnut & 2nd St	0.270 mi SSW
• Vacant Commercial Site	190 Chestnut St	0.276 mi SSW
• Baird Concrete Products, Inc.	15 Locust St	0.288 mi WSW

• Lauvray's Pennzoil Service	213 Main St	0.356 mi SSW
• Former Sunoco Station	202 Main St	0.359 mi SSW
• BP Oil Co. #08276	136 Main St	0.377 mi SSW
• Kwik Fill #S242/287	209 S 2nd St	0.459 mi SSW
• Baird Concrete Supply	15 Walnut St	0.499 SSW

5.2.2.11 Archived Underground Storage Tank Database (ARCHIVE UST)

The ARCHIVE UST database contains underground storage tank records that have been removed from the UST database. The Subject Property was not identified on the ARCHIVE UST database. There was one (1) property listed within a ½-mile radius from the Subject Property on the ARCHIVE UST database.

Equal/Higher Elevation

• Dairy Mart #5355	353 Walnut St	0.441 mi S

5.2.2.12 Emergency Response Database (SPILLS)

The SPILLS database contains incidents reported to the Emergency Response Unit. Not all incidents included in the database are actual spills. The Subject Property was not identified on the SPILLS database. There were seventeen (17) listing on the SPILLS database within a ½-mile radius from the Subject Property, however thirteen (13) listings were associated with the eastern adjoining property, Stone Container.

Equal/Higher Elevation

• Smurfit Stone Container	500 N 4th St at Outfall (twice)	0.067 mi S
• Stone Container	500 4th St (eleven times)	0.067 mi S
• Waste Management Inc.	500 Main Street	0.383 mi SSE

Lower Elevation

• Coshocton Water Plant	118 Bridge St.	0.168 mi W
• Yellow Freight Systems	ST RT 36 at ST RT 16	0.366 mi W
• Transport Services Inc.	122 S Water St.	0.476 mi SSW

The seventeen (17) SPILLS database listings for Smurfit Stone Container included twenty-three (23) event reports. Seventeen (17) of the reports involved a spill of waste

water. Other spill reports consisted of spills of process water and suspended solids in 1991, phosphoric acid and pulping liquor in 1992, lagoon water in 2005 and primary clarified water in 2008. No further details were outlined in the EDR provided SPILLS database. A spill of Eco Wash Cleaner and Ink was reported at the Waste Management Inc. facility in 2000. A spill of lime sludge was reported at the Coshocton Drinking Water Plant in 2005. A spill of diesel fuel was reported in 1992 at the Yellow Freight Systems facility. A diesel fuel spill was also reported at the Transport Services Inc. facility in 2003.

5.2.2.13 Engineering Controls (ENG CONTROLS)

ENG CONTROLS contains properties with engineering controls. The Subject Property was not identified on the ENG CONTROLS database and there were no properties identified within a ½-mile radius from the Subject Property on the ENG CONTROLS database.

5.2.2.14 Institutional Controls (INST CONTROLS)

INST CONTROLS contains properties with institutional controls. The Subject Property was not identified on the INST CONTROLS database and there were no properties identified within a ½-mile radius from the Subject Property on the INST CONTROLS database.

5.2.2.15 Voluntary Action Program Database (VCP)

VCP contains sites that are involved in Ohio's Voluntary Action Program (VAP). The Subject Property was not identified on the VCP database, and there were no properties identified within a ½-mile radius from the Subject Property on the VCP database.

5.2.2.16 Drycleaners (DRYCLEANERS)

The DRYCLEANERS database contains a listing of drycleaner facility locations. The Subject Property was not identified on the DRYCLEANERS database and there were no properties identified within a ½-mile radius from the Subject Property on the DRYCLEANERS database.

5.2.2.17 Ohio Brownfield Inventory (BROWNFIELDS)

BROWNFIELDS is a database containing an inventory of Brownfield sites in the State of Ohio. Brownfields are abandoned, idled, or under-used industrial or commercial properties where expansion or redevelopment is complicated by known or potential releases of hazardous substances or petroleum. The Subject Property was not identified on the BROWNFIELDS database and there were no properties identified within a ½-mile radius from the Subject Property on the BROWNFIELDS database.

5.2.2.18 National Pollutant Discharge Elimination System (NPDES)

The NPDES database contains general information regarding discharge permits. The Subject Property was not identified on the NPDES database, however there was one (1) property identified on the NPDES database within a ½ - mile radius of the Subject Property.

Equal/Higher Elevation

• City of Coshocton	760 Chestnut St	0.438 mi SE

The City of Coshocton was issued a NPDES permit on June 5, 2009 for the 760 Chestnut St property.

5.2.2.19 Title V Permits Database (AIRS)

AIRS is a database containing a listing of all Title V Permits issued by the Division of Air Pollution Control. It is a federally operating permit program adopted and implemented by the state. The Subject Property was not identified on the AIRS database and there were no properties within a ½ mile radius of the Subject Property.

5.2.3 EDR Proprietary Records

5.2.3.1 Manufactured Gas Plants

Manufactured Gas Plants is a database produced by EDR which contains records of coal gas plants. Manufactured gas sites were used in the United States from the 1800s to the 1950s. Byproducts from the processes were frequently disposed of directly at the plant site and can remain, or spread slowly, serving as a continuous source of soil and groundwater contamination. The Subject Property was not identified on the

Manufactured Gas Plant database; however there were two (2) sites within a 1 mile radius of the Subject Property identified on the Manufactured Gas Plant database.

Equal/Higher Elevation

• Coshocton Gas Company	North of 3rd Street	Adjoining
• Coshocton Light and Heat	N 4th Street	0.062 mi SSE

5.2.3.4 Non-Geocoded Records

Non-geocoded records are those that are unable to be plotted due to inadequate address or location information. The Subject Property was not listed as a non-geocoded site. Smurfit Stone Container Enterprise, the property adjoining to the east was listed as a non-geocoded site on the AIRS database. There weren't any additional non-geocoded records of significance relative to the Subject Property or adjacent properties.

5.3 Other Environmental Records Sources

Other Records Review Results

Database	Data Source
ODNR	ODNR
Health Department	Coshocton City Health Department
Fire Department	Coshocton Fire Department
Building Department	Coshocton City Hall
Local Emergency Planning Committee	Coshocton County EMA/LEPC

5.3.1 ODNR

There are no oil & gas wells on the Subject Property or any within a ½-mile radius of the Subject Property. Based on the Groundwater Resources Map of Coshocton County, the nearest municipal well is located within ½-mile to the northwest of the Subject Property and is drilled eighty-two (82) feet into sand and gravel. The municipal well yields 500 gallons per minute (gpm). A groundwater well radius search was performed using the ODNR web based radius search system; the well log search revealed thirty-six (36) groundwater wells situated within a ½-mile radius of the Subject Property. Well

logs are provided in Appendix G and the locations of several wells located within ¼ mile of the Subject Property are depicted on Figure 7.

5.3.2 City of Coshocton Health Department

Mr. Mark Frank of the City of Coshocton Health Department, Environmental Health Division was contacted for information pertaining to environmental issues and complaints at the Subject Property. The request included the Subject Property located at 500 N. Third Street, Coshocton Ohio. Mr. Frank replied by email stating that computer records showed no information of complaints on the Steel Ceilings Site.

5.3.3 City of Coshocton Fire Department

Mr. Jeffery Corder, Fire Prevention Officer with the Coshocton Fire Department was contacted for information regarding USTs, chemical spills or other environmentally sensitive information. BJAAM received correspondence via email stating there is no record of any type of fires or spills on the property that would have caused issues dating back to January 1, 1999.

5.3.4 City of Coshocton, City Hall

Ms. Cherry Wilson of Coshocton City Hall was contact for information with regard to zoning and permitting at the Subject Property. Ms. Wilson replied by telephone stating the Subject Property is zoned M-1 (Light Manufacturing District).

5.3.5 Coshocton County Local Emergency Planning Committee

Mr. James Van Horn, of the Coshocton County Local Emergency Planning Committee was contacted for information pertaining to chemical spills or storage, USTs, fires or other environmental issues at the Subject Property. Mr. Van Horn replied by letter stating that files had been found. According to chemical inventory forms included with the site file, trichloroethylene, xylene, and paint were used at the Subject Property.

Correspondence logs and interview records are included in Appendix A.

6.0 RECONNAISSANCE FINDINGS AND ENVIRONMENTAL HISTORY REVIEW

6.1 Reconnaissance Findings and Environmental History

A summary of uses and conditions consistent with VAP requirements indicating the likelihood of Identified Areas and historic environmental review in connection with the Subject Property is provided below. For each of the present and historic uses or conditions identified on the Subject Property, detailed information is discussed following the summary along with an opinion about the significance of the listing to the analysis of Identified Areas in connection with the Subject Property. The entire property, including the interior of the site building and property grounds was inspected during the site visit. The adjoining properties were inspected from a location within the Subject Property boundaries and/or from public right of ways. Topography at the formerly occupied southern portion of the Subject Property is, on average, 460 feet above mean sea level (amsl) and the elevation slopes generally to the south, towards the Tuscarawas River. The property slopes steeply to the south approximately 115 feet to the north of the property building. A creek is located approximately 200 feet north of the site building beyond the base of the steep slope. Active and remnant utilities were identified at the Subject Property. Lastly, an overhead utility right-of-way is situated traversing the property in an east/west fashion north of the site building.

IDENTIFIED YES	IDENTIFIED NO	
☒	☐	Hazardous Substances In Connection With Property Use
☒	☐	Petroleum Products In Connection With Property Use
☒	☐	AST, UST Hazardous Substance or Petroleum Product Storage
☒	☐	Hazardous Substance and Petroleum Product Containers and Unidentified Containers In Connection With Property Use
☐	☒	Hazardous Substance and Petroleum Product Containers and Unidentified Containers Not In Connection With Property Use
☒	☐	Electrical or Mechanical Equipment
☒	☐	Stains or Corrosion on Interior of Facility
☒	☐	Drains, Sumps, and Trenches
☒	☐	Pools of Liquid and Standing Surface Water
☒	☐	Pits, Ponds and Lagoons

☐	☒	Stained Soil or Pavement
☒	☐	Stressed Vegetation
☒	☐	Solid Waste Dumping, Landfills, and Suspect Fill Material
☒	☐	Waste Water Discharges
☒	☐	Wells
☐	☒	Septic or Sewage Tanks
☒	☐	Odors
☒	☐	Suspected Asbestos Containing Material
☒	☐	Other Uses or Conditions of Concern

6.1.1 Hazardous Substances in Connection with Property Use

Prior to being occupied by the Steel Ceiling Company, the Subject Property was occupied by two (2) enameling operations.

Most hazardous substances associated with the Subject Property included paint and solvents such as mineral spirits and trichloroethylene and were used in connection with metals fabrication, finishing and enameling. Three (3) paint booths were observed in the southerly most building addition. The entire southerly building addition contained pipes believed to be used to pump paint and solvents into the room. A 6,000 gallon aboveground storage tank (AST) was identified at the easterly wall between Building 1 and Building 15. According to a blue print discovered in the vacant building, the AST formerly contained trichloroethylene.

6.1.2 Petroleum Products in Connection with Property Use

The Subject Property utilized fuel oil, cutting oils, and other miscellaneous lubricant and maintenance fluids for metals fabrication. The fuel oil was contained in three (3) 20,000 gallon USTs located at the eastern property boundary near the end of North Fourth Street. It is believed that the USTs are still underground in that location.

6.1.3 AST, UST, Hazardous Substance or Petroleum Product Storage

Three (3) USTs are believed to be buried to the west of Building 1. According to a blue print found in the building during site reconnaissance, the three (3) USTs contained fuel oil. A 6,000 gallon empty AST was identified between Building 1 and Building 15. According to the blue print found on site, the AST once contained trichloroethylene. According to historical Sanborn Fire Insurance Maps from 1905 through 1931, a large

gas holder or gasometer was located in the southwester portion of the Subject Property and was likely operated by the Coshocton Gas Plant located adjacent to the west of the Subject Property. .

6.1.4 Hazardous Substance and Petroleum Product Containers and Unidentified Containers In Connection With Property Use

During site reconnaissance several fifty-five (55) gallon drums and other containers were identified throughout the Building and at the exterior of the building. Many of the drums were unlabeled drums found according to their locations and a description of each drum label is listed below:

Exterior of building, receiving area to the west of Building 2 and north of Building 8:

- One (1) drum, full, contents unknown
- Four (4) empty, unlabeled drums

Exterior of building, to the east of Building 6, along eastern property boundary:

- Five (5) empty unlabeled drums painted green
-

Building 1

- One (1) drum sodium hydroxide

Building 2

- One (1) drum, isopropyl alcohol
- One (1) drum, mineral spirits
- One (1) drum, metal working fluid
- One (1) drum, lithion soap grease, containing none lead additives
- One (1) drum, recycled solvent
- Two (1) 1 gallon containers, denatured solvent alcohol
- One (1) approximately 25 gallon container, natural degreaser/deodorizer
- Approximately nine (9), 1 gallon containers of paint

Building 6

- One (1) 5 gallon container, steam boiler water treatment compound

Building 8

- One (1) drum heavy duty metal drawing or stamping fluid
- One (1) drum hydraulic fluid
- One (1) drum solvent degreaser
- One (1) drum lubricant
- One (1) drum used oil
- Six (6) unlabeled drums
- Three (3) 5 gallon buckets, contents unknown

Building 11

- One (1) drum, labeled Cleen Rite solvent/degreaser
- One (1) drum, empty

6.1.5 Electrical or Mechanical Equipment

A former transformer substation was identified to the east of Building 7 and north of Building 1. The substation was identified as a fenced in area, with a concrete pad that at one time held the electrical transformers. Large electrical wires protrude from Building 1 and would have connected to the electrical transformers. Several light bulbs were identified in an area also containing several drums along the western interior wall of Building 2.

6.1.6 Stains or Corrosion on Interior of Facility

Areas of staining were observed in several areas at the interior of the structure including along the northern interior wall of Building 2. Portions of the floor at the interior of Building 7 were finished with wooden bricks which appeared to be stained or wet in some areas.

6.1.7 Drains, Sumps, and Trenches

Three (3) sumps which appeared all to have drains leading to the north, were identified at the exterior of the Subject Property, including one (1) to the north of Building 7, one (1) at the northwestern corner of Building 2 and one (1) to the north of Building 2. Two (2) trench drains were identified within Building 10 in a paint mixing area. On (1) drained was identified at the interior of Building 7. No other drains of significance within the site building were noted.

6.1.8 Pits, Ponds, and Lagoons

Two (2) large pits, approximately 5ft x 10ft x 6ft were identified at the eastern side of Building 7. A third pit was identified at the western side of Building 7 and was the approximate size and shape of the easterly pits. The westerly pit was full of what appeared to be water with an oily sheen. The pits were surrounded by a floor made of wooden bricks. A large, approximately 15ft x 30ft x 7ft concrete pit was identified within Building 10 and was the former location of a TCE degreaser. A smaller pit approximately 10ft x 10ft x 2ft was also identified in Building 10 and appeared to extend to soil.

6.1.9 Stressed Vegetation

Stressed vegetation and lack of vegetation were observed in the area north of Buildings 2 and 6, north of the former loading dock area.

6.1.10 Suspect Fill Material

An area of suspected fill material was identified in an area north of Buildings 2 and 6, north of the former loading dock area. According to an interview with former Steel Ceilings maintenance person, Mr. David Lear, enamel signs as well as drums of paint sludge, spent TCE and spent ethylene chloride were buried to the north of Building 6.
In addition, concrete slabs and brick were identified in the area sloping north toward the unnamed creek approximately 115 feet north of the site building.

6.1.11 Waste Water Discharges

A water discharge system was identified on the Subject Property approximately 200 feet to the north of the site building, along the eastern property boundary. The area was fenced in and contained a pump house and a spill kit. It appeared that drain pipes were running from the eastern adjoining property, Stone Container, into a filtration system and then into an unnamed creek.

6.1.12 Wells

There were no wells identified on the Subject Property during site reconnaissance.

6.1.13 Odors

Indistinguishable odors were present throughout the Subject Property.

6.1.14 Suspect Asbestos Containing Material

Asbestos, a naturally occurring mineral that was commonly used in building construction for its insulation, acoustical, tensile, and decorative properties has been shown to be a carcinogen when inhaled or ingested. EPA bans on asbestos started in the 1970's. Bans were implemented under the National Emission Standard for Hazardous Air Pollutants (NESHAP) and The EPA Ban and Phase out Rule of 1989. A summary of asbestos containing materials which were banned in the Unites States is listed below.

United States Asbestos Bans	
NESHAP Bans	
• Spray-applied fireproofing - 1973	
• Preformed block pipe, boiler, tank, duct insulation - 1975	
• Spray-applied decorative uses - 1978	
• Other decorative uses - 1990	
EPA Ban and Phase Out Rule 1989-1991	
• Corrugated paper	• Specialty paper
• Roll board	• Flooring felt
• Commercial paper	• New uses of asbestos
Examples of Products Not Banned	
• Asbestos cement (transite)	• Friction products (disc brakes, brake

• Asphalt roofing products	drums, transmission parts & clutch facings)
• Ceiling Tile	
• Resilient flooring (tile & sheeting)	• Clothing and clothing products
• Mastics	• Caulking & glazing
• Millboard	• Light concrete
• Wallboard & joint compound	• All other uses not mentioned in bans

According to the EPA, asbestos-containing material (ACM) is defined as material containing more than 1% asbestos. Friable ACM contains more than 1% asbestos and can be "crumbled, pulverized, or reduced to powder by hand pressure when dry." Friable ACM is thought to readily release fibers into the air. Non-friable ACM contains more than 1% asbestos and cannot be crumbled, pulverized, or reduced to powder by hand pressure when dry.

The buildings on the Subject Property were constructed before 1986. Suspect asbestos containing materials were observed throughout the site building including roof flashing, window caulking, insulation and ceiling tiles in the office area of Building 9. A formal asbestos survey should be conducted prior to any demolition of these PACM materials in accordance to the OSHA standards, the NESHAPS regulations, as well as and any state or local regulations. ACM and presumed ACM (PACM) that is intact and in good condition can, in general, be managed safely in-place under the Asbestos Hazard Emergency Response Act (AHERA) Operations and Maintenance (O&M) Program, until removal is dictated by renovation, demolition or deteriorating material condition.

6.1.15 Other Uses or Conditions of Concern

The Subject Property has had a long history of industrial use including enameling processes, large scale painting, metal working and solvent use.

6.2 Adjoining Property Reconnaissance Findings

A summary of uses and conditions identified on adjoining properties consistent with VAP requirements indicating the likelihood of recognized environmental conditions in

connection with the Subject Property is provided below. For each of the uses or conditions identified on an adjoining property, detailed information is discussed following the summary along with an opinion about the significance of the listing to the analysis of recognized environmental conditions in connection with the Subject Property.

IDENTIFIED YES	IDENTIFIED NO	
☐	☒	Hazardous Substances In Connection With Property Use
☐	☒	Petroleum Products In Connection With Property Use
☒	☐	AST, UST Hazardous Substance or Petroleum Product Storage
☒	☐	Hazardous Substance and Petroleum Product Containers and Unidentified Containers In Connection With Property Use
☐	☒	Hazardous Substance and Petroleum Product Containers and Unidentified Containers Not In Connection With Property Use
☐	☒	Electrical or Mechanical Equipment
☐	☒	Stains or Corrosion on Interior of Facility
☒	☐	Drains, Sumps, and Trenches
☐	☒	Pools of Liquid and Standing Surface Water
☐	☒	Pits, Ponds and Lagoons
☐	☒	Stained Soil or Pavement
☐	☒	Stressed Vegetation
☐	☒	Solid Waste Dumping, Landfills and Suspect Fill Material
☒	☐	Waste Water Discharges
☒	☐	Wells
☐	☒	Septic or Sewage Tanks
☐	☒	Odors
☐	☒	Suspected Asbestos Containing Material
☐	☒	Other Uses or Conditions of Concern

6.2.1 Hazardous Substances in Connection with Adjacent Property Use

Smurfit-Stone Container, the property adjoining to the east of the Subject Property was listed on several environmental databases including RCRAInfo, ERNS, LUST, SPILLS, TRIS, FTTS, ICIS, MLTS, and FINDS. These databases as described in Section 5 of this report.

The property adjoining to the west of the Subject Property is occupied by Columbia Gas of Ohio and was formerly occupied by the Coshocton Gas Plant in the early 1900's, a Historic Manufactured Gas Plant.

6.2.2 Petroleum Products in Connection with Adjacent Property Use

Two (2) releases from UST systems were reported at the adjoining Smurfit-Stone Container property. Release #16000044-N00001 and #1600044-N00002 were issued No Further Action letters.

A former gas tank/gasometer associated with the westerly adjoining property, currently Columbia Gas was depicted on Sanborn Fire Insurance Maps from 1905 through 1931.

6.2.3 AST, UST Hazardous Substance or Petroleum Product Storage

Two (2) releases from UST systems were reported at the adjoining Smurfit-Stone Container property. Release #16000044-N00001 and #1600044-N00002 were issued No Further Action letters.

A former gas tank/gasometer was depicted on Sanborn Fire Insurance Maps from 1905 through 1931 and was located approximately at the western exterior wall of Building 2. The gas tank may have been associated with the western adjoining property.

6.2.4 Hazardous Substance and Petroleum Product Containers and Unidentified Containers in connection with the property

Several steel cages containing tanks of gases were identified beyond the eastern Subject Property and were associated with operations at the Smurfit-Stone Container facility.

6.2.5 Drains Sumps and Trenches

A waste water discharge system was identified on the Subject Property at the eastern property boundary approximately 200 feet north of the Subject Property Site building. It appeared that drain lines were running into the system from the Smurfit-Stone Container Property.

6.2.6 Waste Water Discharges

A waste water discharge system was identified on the Subject Property at the eastern property boundary approximately 200 feet north of the Subject Property Site building. It appeared that drain lines were running into the system from the Smurfit-Stone Container Property.

6.2.7 Wells

Six (6) groundwater monitoring wells were identified at the southwest of the westerly adjoining property at the border of the Subject Property. The groundwater monitoring wells were located in the area where a gas holding tank was identified in Sanborn Fire Insurance Maps from 1905 – 1931.

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7.0 CONCLUSIONS AND RECOMENDATIONS

7.1 Phase I Environmental Site Assessment

BJAAM Environmental (BJAAM) has completed a Voluntary Action Program (VAP)/All Appropriate Inquiry (AAI) Phase I Environmental Site Assessment (ESA) for the Former Steel Ceilings Site (Subject Property) located at 500 North Third Street, Coshocton, Coshocton County, Ohio 43812. The ESA was performed in general accordance with Ohio's Voluntary Action Program (VAP), Ohio Administrative Code (OAC) 3745-300-06 and ASTM Standard E 1527-05, which incorporates the Brownfield Revitalization Act All Appropriate Inquiry (AAI). The assessment was completed to comply with the agreement between BJAAM and the Coshocton Port Authority under Cooperative Agreement #2B-00E88801-1 with the United States Environmental Protection Agency (USEPA).

The purpose of the ESA was to investigate the potential presence of any regulated or hazardous substances including petroleum within the limits of the Subject Property or whether any regulated or hazardous substances including petroleum, from either on-site sources or off-site sources, have potentially negatively impacted the Subject Property.

The Subject Property is approximately 15.8 acres in size, and is comprised of one parcel #0430000296300. According to the Coshocton County Auditor, the Subject Property is owned by 2900 Steel LLC, an Ohio Corporation. According to historical research, the Subject Property was occupied by the Spellacy and Raff Company (manufacturers of kitchen enamel ware) beginning in the early 1900's and the Beach Enamel Company in the 1920's and 1930's. The Steel Ceilings Company occupied the Subject Property from the early 1960's until 2004. There is currently one (1) building at the Subject Property containing twelve (12) building segments with a total area of 83,066 sq ft. Currently the site building is vacant and there are no active site operations.

Interviews and reviews of historical records, aerial photographs, local governmental records and regulatory databases were conducted in accordance with VAP requirements and ASTM Standard E 1527-05 in an effort to identify evidence of Identified Areas (IA) and Recognized Environmental Conditions (REC) that may have impacted the Subject Property. Based on the results of these findings, it has been determined that the following thirteen (13) IAs/RECs need to be further assessed:

1. Hazardous Waste Drum Storage Area (DSA) (Solid Waste Management Unit (SWMU) 1), Raw Material and Empty DSA (AOC 2), and Former Gas Holding Tank/Gasometer
2. Building 10 - Paint Booth Satellite Accumulation Area (SAA) (SWMU 2), Xylene Still and SAA (SWMU 3), Former Tricholoroethene (TCE) Still and SAA (SWMU 4), and Underground Holding Tank (SWMU 8)
3. Scrap Metal Storage Area (SWMU 5)
4. DSA 1 (SWMU 6)
5. DSA 2 (SWMU 7) and Suspected Buried Drums and Septic Tank Area
6. TCE Tank (Area of Concern (AOC) 1) and Area East of Building 15/Eastern Loading Dock
7. Fuel Oil Underground Storage Tanks (USTs) (AOC 3)
8. Waste Water Discharge Outfalls (AOC 4)
9. Former Transformer Substation
10. Metal Fabricating Area/Furnace Room (Building 7)
11. Interior DSA (Building 8)
12. Beach Enamel Company/Spellacy and Raff Company Manufacturing Area and Interior DSA (Building 2)
13. Suspected Buried Kiln (Building 4)

1. Hazardous Waste Drum Storage Area (SWMU 1), Raw Material and Empty DSA (AOC 2), Former Gas Holding Tank/Gasometer: SWMU 1, the Hazardous Waste DSA was located at the western exterior wall of Building 2 and was active beginning in 1930. The area consisted of hazardous waste stored in drums, outside, on a sand and gravel parking surface for less the 90 days. The unit had no primary or secondary containment. The potential exists for a past release to have occurred in this area. The unit should undergo proper RCRA closure including soil and groundwater sampling. AOC 2, the Raw Material and Empty DSA, located along the western property boundary, along the fence line bordering the Columbia Gas

Service Center, north of the gated site entrance was active from at least 1956 until at least 1994. The area consisted of outside storage of drums of solvents used in painting operations. The drums were stored on a gravel surface. No secondary containment system or berm surrounded the area. The potential exists for a release to have occurred from this area to environmental media. A former gas holding tank was identified to the west of Building 2 in Sanborn Fire Insurance Maps dated 1905 thru 1931. Furthermore, a research of historical city directories indicates the Subject Property was also occupied by the Union 76 Co. bulk plant from the late 1960's thru at least the mid 1970's. Chemicals of Concern (COCs) include Volatile Organic Compounds (VOCs), Polycyclic Aromatic Hydrocarbons (PAHs), Priority Pollutant Metals (PP Metals), Total Petroleum Hydrocarbons – Gasoline Range Organics (TPH-GRO), and Total Petroleum Hydrocarbons – Diesel Range Organics (TPH-DRO).

2. Building 10 - Paint Booth SAA (SWMU 2), Xylene Still and SAA (SWMU 3), Former TCE Still and SAA (SWMU 4), and Underground Holding Tank (SWMU 8): SWMU 2, the Paint Booth Satellite SAA, located on a concrete area within Building 10, managed hazardous and nonhazardous waste. No cracks or active drains were found near the unit. Small paint spills were found near the drums during a 1994 Preliminary Assessment/Visual Site Inspection conducted by PRC Environmental Management, Inc. (PRC) under contract with the U.S. EPA. PRC recommended no further action for the SWMU 2 in 1994. SWMU 3, the Xylene Still and SSA were located at the westerly end of the interior Building 10. The unit managed xylene-contaminated paint sludge and plastic bags used in the xylene distillation process. No floor drains were identified nearby. PRC recommended no further action for SWMU 3. SWMU 4, the Former TCE Still and SSA was located at the northerly wall of Building 10, east of center and was identified as a large pit approximately 15ft x 30ft x 7ft in size. The unit was no longer active during the 1994 visual inspection. In December 1993, Steel Ceilings converted the TCE vapor degreaser to a mildly alkaline aqueous degreaser, totally eliminating the use of TCE at the facility. There is a history of release to the City of Coshocton sanitary sewers from this unit.

According to PRC, the potential for a release to have occurred in this area was low. PRC recommended no further action for SWMU 4. SWMU 4 is located next to a drain connected to SWMU 8. Ohio EPA suspected that wastes from SWMU 4 or SWMU 8 could have been released to groundwater and on-site soils. SWMU 8, the Underground Holding Tank, located approximately at the front of the property, south of Building 10 was active from about 1954 until 1990. The facility used the 8,000 gallon underground holding tank to collect discharge from solvent and paint sludge containing waste water. In 1990, the Ohio EPA recommended that the waste water be rerouted and the tank eliminated from the waste stream because of the potential for soil and groundwater contamination from the tank or piping. Steel Ceilings eliminated the tank from the waste stream in July of 1990. COCs for the areas identified within Building 10 include VOCs and PP Metals.

3. Scrap Metal Storage Area (SWMU 5) – SWMU 5, the Scrap Metal Storage Area located to the north of Building 7 and west of Building 2 was active beginning in approximately 1930. Nonhazardous steel and aluminum metal scrap were managed in drums and a roll off box on a concrete pad. No releases from the unit were documented. PRC recommended no further action for SWMU 5. COCs include PP Metals and PCBs.
4. Inactive DSA 1 (SWMU 6) - SWMU 6, DSA 1, located at the northern exterior wall of Building 2 was active from about 1930 until 1983. The unit stored hazardous waste outdoors, in drums on sand and gravel for greater than 90 days. The unit was closed in 1983 and approximately 20 cubic yards of TCE contaminated soil and 100 drums were removed. There were no sampling details of the unit's closure documented and according to PRC, the EPA stated it was just beginning to develop closure policy at that time. COCs include VOCs, PAHs, and PP Metals.
5. Inactive DSA 2 (SWMU 7) and Suspected Buried Drums and Septic Tank Area - SWMU 7, DSA 2, located to the northeast of Building 6 was active from about 1930 until 1983. The unit stored hazardous waste outdoors, in drums on sand and gravel for greater than 90 days. The unit was closed in 1983 and approximately 20 cubic yards of TCE contaminated soil were removed. There were no sampling details of

the unit's closure documented and according to PRC; the EPA stated it was just beginning to develop closure policy at that time. The potential exists for a release to have occurred from this unit to environmental media. The unit should undergo soil sampling. In addition, vegetation in the area north of the northern loading dock (Building 6) appeared to be stressed. According to an interview with Mr. David Lear, former Maintenance Person with Steel Ceilings, this area to the north of Building 6, beyond the loading dock area may contain buried drums containing paint sludge, spent trichloroethylene and spent ethylene chloride. Other waste including enamel signs may also be buried in that area. According to Mr. Lear, a septic tank is located underground to the east of Building 6. COCs include VOCs, Polycyclic Aromatic Hydrocarbons (PAHs), PP Metals and PCBs.

6. TCE Tank (AOC 1) and Area East of Building 15/Eastern Loading Dock- AOC 1, the TCE aboveground storage tank (AST) located between Buildings 1 and 15 on a concrete pad was active from 1946 until 1994 and held 1,500 gallons of TCE. Access to the tank was on the east side. The concrete pad was unbermed and the area to the east of the AST was gravel covered. The eastern loading dock is located at the eastern wall of Building 15, just south of the TCE AST. This loading dock may have been used for the delivery of hazardous materials as Building 15 adjoins Building 10 where solvents and paint were utilized in the operations of Steel Ceilings. COCs include VOCs and PP Metals.
7. Fuel Oil USTs (AOC 3) - AOC 3, the Fuel Oil USTs located approximately 15 feet east of Building 1 were active from approximately 1931 until 1962. The area consisted of three (3) abandoned fuel oil USTs with a total capacity of 20,000 gallons. The tanks were first identified on a 1931 Sanborn Fire Insurance Map. The age and composition of the tanks are unknown. It was unknown whether the tanks had any release control systems. COCs include VOCs, PAHs, TPH-GRO, and TPH-DRO.
8. Waste Water Discharge Outfalls (AOC 4) - AOC 4, the Tuscarawas River Waste Water Discharge Outfalls consisted of two (2) waste water outfalls located extending out of the embankment north of the Subject Property site building. The

outfalls were connected to floor drains throughout the facility until 1990. The outfalls were not identified during site reconnaissance, however, according to a previous environmental report; in 1994 one of the outfalls was still active discharging cooling water from an air compressor. The other outfall appeared to be covered with brush and rubble from fill that had been placed along the bank. Aerial photos indicated a white colored waste water discharge from these areas. Wastewater from floor drains and a vapor degreaser may have discharged to soil and sediments of an unnamed creek which leads to the Tuscarawas River approximately 400 feet to the west of the Subject Property. The outfalls were used from 1906 until wastewater lines were rerouted in 1990. COCs include VOCs, PAHs, PP Metals, and PCBs.

9. Former Transformer Substation - A former transformer substation was identified to the east of Building 7 and north of Building 1. The substation was identified as a fenced in area with a concrete pad. Large electrical wires protrude from Building 1 and would have connected to the electrical transformers. Based on interviews with Mr. Dave Lear, former Maintenance Person with Steel Ceilings, the transformers were originally installed in approximately 1948. One (1) transformer was replaced in the 1950s. The potential exists for a release to have occurred from this area to environmental media. COCs include VOCs, PAHs, TPH-DRO, TPH-ERO, and PCBs.
10. Metal Fabricating Area/Former Beach Enamel Furnace Room (Building 7) – The area within the interior of Building 7 was used for metal cutting, stamping and fabricating. Three (3) pits, approximately 10ft x 10ft x 6ft were identified and previously were the locations of metal fabricating machines. The floor surrounding the metal fabricating machines was constructed of wooden brick. The westerly most pit is full of water with an oily sheen at the surface. Building 7 was used by the Beach Enamel Company as a furnace room. COCs include VOCs, PAHs, PP Metals and PCBs.
11. Interior DSA (Building 8) – Several material containers were identified at the eastern portion of Building 8 during site reconnaissance including the following: one (1)

drum of heavy duty metal drawing or stamping fluid, one (1) drum of hydraulic fluid, one (1) drum of solvent degreaser, one (1) drum of lubricant, one (1) drum of used oil, six (6) unlabeled drums, and three (3) 5 gallon buckets, contents unknown. The drums were stored on wooden crates on a concrete surface. COCs include VOCs, PAHs, and PP Metals.

12. Beach Enamel Company/Spellacy and Raff Company Manufacturing Area and DSA (Building 2) – The Beach Enamel and Spellacy and Raff Companies manufactured enamel ware at the Subject Property from at least the early 1900's through the 1930's. The main factory area for these operations was located in the area of Building 2. In addition, several containers of material were identified within Building 2 during site reconnaissance including the following: One (1) drum of isopropyl alcohol, one (1) drum of mineral spirits, one (1) drum of metal working fluid, one (1) drum of lithion soap grease containing none lead additives, one (1) drum of recycled solvent, two (2) 1 gallon containers of denatured solvent alcohol, one (1) approximately 25 gallon container of natural degreaser/deodorizer and approximately two (2) pallets and several additional 1 gallon containers of paint. Several light bulbs were also observed in this area. COCs include VOCs, PAHs, and PP Metals.
13. Suspected Buried Kiln (Building 4) – In an interview on May 17, 2010 Mr. David Lear, Former Maintenance Person with Steel Ceilings stated that during his time with the company, a large underground brick kiln was discovered in Building 4 when a portion of the floor collapsed under the weight of a tow motor. Pipes were found extending west from the brick kiln in Building 4 toward and beneath Building 2. The kiln was likely used in the manufacturing of enameled products produced by the Beach Enamel Company and/or Spellacy Raff Company from the early 1900's through at least the 1930's. COCs include VOCs and PP Metals.

The following potential off site area of concern (AOC) has been identified in connection with the adjoining property and could be impacting the Subject Property.

1. The property adjoining to the east of the Subject Property, Smurfit-Stone Container Division is listed on the Toxic Chemical Release Inventory System database and discharges liquid waste including lead compounds, acetaldehyde, dioxin and dioxin like compounds, and methanol to an unnamed creek which traverses the Subject Property approximately 170 feet north of the Subject Property site building. The creek flows to the west toward the Tuscarawas River located approximately 400 feet from the Subject Property. The waste stream outflow is located along the eastern Subject Property boundary.

Historic operations at the Subject Property may have resulted in release of contaminants. For approximate locations of the IAs/RECs outlined above, see Figures 3a – Site Map and 3b – IA/REC Map. Quantities and timing of potential release(s) cannot be determined from the information gathered for this Phase I report. The potentially impacted media includes but may not be limited to soil, groundwater, sediments, and/or surface water. Potential Chemicals of Concern (COC) include VOCs, SVOCs, PAHs, TPH-GRO, TPH-DRO, TPH-ERO, PP Metals, PCBs, and asbestos. Measures taken to address any potential release(s) will be covered within the Phase II of this project.

BJAAM recommends a comprehensive Phase II Environmental Site Assessment in accordance with VAP requirements be performed to evaluate the adverse environmental impact on soil and groundwater resulting from the Identified Areas outlined above. The Phase II ESA will allow BJAAM to delineate COCs in connection with historic operations from the IAs/RECs and determine compliance with applicable ASTM and VAP requirements.

8.0 PROFESSIONAL SIGNATURES

This report has been prepared for the exclusive use of the Coshocton Port Authority. The information presented in this document is proprietary and confidential information which is a trade secret of BJAAM Environmental, Inc. BJAAM Environmental, Inc. asserts a business confidentiality claim covering all information and all data contained on each page of this document. Any unauthorized dissemination or reuse of this document will be at the user's sole risk and with the condition that BJAAM Environmental, Inc. be held harmless from any and all claims for losses or damages and expenses arising out of or resulting from such unauthorized disclosure or reuse.

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July 2010